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Opening the Doors Job Training Programs Part One: Recommendations and Summary Findings.

Greenleigh Associates, Inc., New York, N.Y.

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Part One of this report summarizes the detailed data and findings of Part Two (VT 005 949). A thoroughly documented analysis of federally supported job training programs in terms of their scope, interrelationships, and administration (including inter- and intra-agency coordination) led to 25 recommendations, including: (1) Consolidation of program administration in a single Cabinet-level agency, newly formed or existing, is not desirable or appropriate at this time, (2) An office should be established within the Department of Labor to expedite and implement equal opportunity in all federally supported manpower programs, (3) Resources for training programs should be expanded, with funding sufficient to make significant inroads in the problems they seek to remedy, (4) A time period longer than 12 months is desirable for funding programs, along with simplification of the refunding process, and (5) Planning grants should be made available to state and/or local governments for the development of comprehensive manpower plans, incorporating education, work, and training programs with the necessary sequential linkages and related manpower services. Each recommendation is supported by a synopsis of relevant findings. Five appendixes contain excerpts from selected literature pertaining to manpower policy. See also VT 006 507. (ET)

c/

OPENING THE DOORS: JOB TRAINING PROGRAMS

A Report to the Committee on Administration of Training Programs

PART ONE—RECOMMENDATIONS AND SUMMARY FINDINGS

ED023839

VT005948

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OPENING THE DOORS¹ - JOB TRAINING PROGRAMS,

A REPORT
TO
THE COMMITTEE ON ADMINISTRATION OF TRAINING PROGRAMS

Part One - Recommendations and Summary Findings.

February 1968

Greenleigh Associates, Inc.

New York Chicago San Francisco Washington

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greenleigh associates, inc.

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February 20, 1968

Dr. Weston E. Vivian, Chairman
Committee on Administration of Training Programs
Washington, D. C.

Dear Dr. Vivian:

We are pleased to transmit the Final Report of the study which Greenleigh Associates was commissioned to make for the Committee on Administration of Training Programs.

Part One of the Report is titled Recommendations and Summary Findings; Part Two is Text and Tables. The "heart" of Part Two has already been transplanted to Part One. Both parts are compatible. The summary findings in Part One capsule the detailed data and analysis contained in Part Two.

The Report contains materials essential for the Committee's deliberations, presenting a thoroughly documented analysis of federally supported job training programs in terms of (a) their scope and inter-relationships, and (b) their administration, including inter- and intra-agency coordination.

The study identifies the problems and the considerations relevant to their solution, based on:

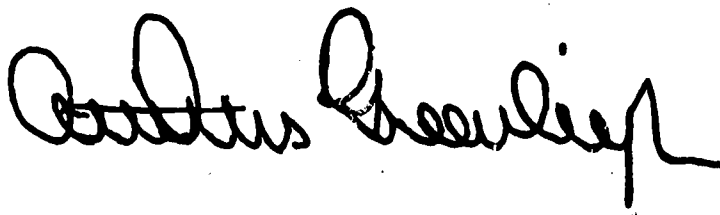
- A first-hand examination of program operations at every level;
- A solidly researched analysis of relevant data and documents.

Recommendations are set forth, this being one of the contractual requirements. Every recommendation is derived from findings in this study, and is so identified.

It has been a pleasure to work with you and the other distinguished members of the Committee. The special expertise which each Committee member brings to bear on the Committee's charge has been a valuable resource in our work.

We share with the Committee an appreciation of the importance and urgency of its task. The doors to job opportunities can be opened wide through job training programs which are properly administered and engineered. The Committee's work contributes greatly to that end.

Sincerely,

A handwritten signature in dark ink, appearing to read "Arthur Greenleigh", with a stylized, flowing script.

Arthur Greenleigh
President

AG/md

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NOTE: Armando M. Rodriguez served as a member of the Committee until June 30, 1967. He resigned from the Committee and from his post as Chief of the Bureau of Intergroup Relations, California Department of Education, Sacramento, and accepted a post with HEW.

Harold Dunne of the UAW, Detroit, participated in Committee sessions as an observer for Leonard Woodcock, when labor negotiations in the automobile industry required Mr. Woodcock's presence.

Origin of THE COMMITTEE ON ADMINISTRATION OF TRAINING PROGRAMS

Conference Report 2331, House Appropriation Bill FY 1967 (Departments of Labor and Health, Education, and Welfare), Amendment 32:

"...\$150,000 of this appropriation shall be available only for transfer to the appropriation 'Office of the Secretary, salaries and expenses' for a comprehensive study of the administration of training programs financed partially or wholly with Federal funds. The conferees do not intend that this study include training programs that agencies operate for their own employees or training of professional personnel but rather training under such programs as vocational education, institutional, and on-the-job training under the Manpower Development and Training Act, apprenticeship and training program, Job Corps, specialized training programs under Title II of the Economic Opportunity Act, work experience program, work-study program, Neighborhood Youth Corps, etc.

"This study is to have as its principal purposes to determine if there is waste, duplication, and inefficiency in administering these programs as many individual programs and, if this determination is in the affirmative, to make recommendations for correction. The study is to be made by a committee of experts in the field, none of whom are to be Federal Government employees, to be appointed by the Secretary of Health, Education, and Welfare after consultation with the Secretary of Labor and the Director of the Office of Economic Opportunity. It is the opinion of the conferees that it would be preferable if the committee's staff was also selected from outside the Federal Government."

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Chapter I

INTRODUCTION

Is there (in the language of Amendment 32) waste, duplication, and inefficiency in administering the federally supported training programs as many individual programs? If "Yes," (still in the language of Amendment 32) what are the recommendations for correction?

The terms "waste, duplication, and inefficiency" have various definitions and connotations. In the discussion of training programs here, the applicable definitions are:

<u>Term</u>	<u>Definition</u> ^{1/}
<i>Waste</i>	<i>Useless consumption or expenditure; use without adequate return.</i>
<i>Duplication</i>	<i>Anything corresponding in all respects to something else.</i>
<i>Inefficiency</i>	<i>Inability to effect or achieve the desired result with reasonable economy of means.</i>

The intensive study of the administration of job training programs, by Greenleigh Associates, Inc. for the Committee on Administration of Training Programs, discloses:

- There is waste and inefficiency and--to a much more limited extent--duplication, in the training programs as presently operated.

^{1/}The Random House Dictionary of the English Language (Unabridged ed.; New York: Random House, 1966).

- The extent to which waste, duplication, and inefficiency exist, is not so great that the usefulness of the programs is vitiated, although their effectiveness is diminished.
- Waste, duplication, and inefficiency are not entirely attributable to administrative shortcomings. These are present, but waste, duplication, and inefficiency are often caused or exacerbated by other factors, such as statutory constraints, fiscal limitations, etc.
- Waste, duplication, and inefficiency are not solely the result of administering the programs as many individual programs. This is an element, but by no means the only one.

The recommendations which follow, in Chapter II, call for statutory changes in some respects and administrative changes in others. Each recommendation is based on the firsthand findings of the Greenleigh study, plus a broad review of voluminous material from relevant documents and publications.

The study penetrated every level of government involved in the administration of training programs: Federal, regional, State, county, and local. It went into two widely separated States, California and Missouri, which are highly diverse in terms of job training programs, as well as in socio-economic characteristics. Within those States, it reached into four cities--Oakland, Fresno, St. Louis, Springfield--which differ greatly in training program activity, as well as in size, urbanization and other critical characteristics. Additionally the study acquired information on job training programs and Employment Service relationships in six cities in other States: Boston, Dallas, Huntington, Miami, Phoenix, Seattle.

We have seen the job training programs, "warts and all," from both ends of the telescope and from every magnification. The problems look different from different perspectives: the Federal administrator's perspective, which is necessarily a national one; the State administrator's perspective which is understandably state-wide, and the local administrator's perspective which obviously is local.

The telescope has been focused every day, observing the myriad changes in program administration, procedures, and directions. The job training spectrum today is not what it was when Amendment 32 was passed. Indeed, there have been major changes during the period of this study; these figure in the recommendations in this Final Report.

Although the "warts" must be our focus in this report, we are not blind to the many good features of job training program activities. Indeed we are impressed with the amount of useful activity there is, despite the many obstacles which impede manpower programs. *There is nothing wrong with the programs that better structures and better support will not remedy.* It is to these that the recommendations are addressed.

Because the problems are extensive and varied, the recommendations are numerous and multifaceted. They have been developed with a long glance backward to the local communities where ultimately their soundness will be tested. Here, as in real life generally, solutions proposed from afar may be unrealistic or too simple. Of course, wherever a simple solution is possible it is eminently desirable and has been recommended here.

As far as possible, the recommendations are operational in nature, in the sense that--given the necessary administrative concurrence and legislative consensus--they will produce changes in the way the programs are operated, within a reasonably short period of time. In some instances the recommendation is for an administrative response to a specific problem identified in the recommendation; the recommendation does not prescribe a methodology where specificity would be presumptuous or mischievous.

Not all the problems are susceptible to prompt resolution. Time is required for more experience and for long-term solutions. But there is enough experience for intelligent action now. The manpower programs are directed to urgent and explosive situations, and their shortcomings must be confronted as quickly as possible, even while long-run solutions are in process or on the drawing boards.

The training programs are opening the doors to job opportunities for thousands of individuals. But there are tens of thousands more who wait outside the doors.^{2/} Quickly and with all required resources, the door-stops must be removed and entry widened.

^{2/}"...job training is being given tonight to more than a million Americans in this country.

"...And this year, the time has come when we must get to those who are last in line--the hard-core unemployed--the hardest to reach.

"Employment officials estimate that 500,000 of these persons are now unemployed in the major cities of America; and our objective is to place these 500,000 in private industry jobs within the next three years." President Johnson's State of the Union Message to Congress, as recorded by the New York Times, January 18, 1968, p. 16.

Chapter II

RECOMMENDATIONS AND FINDINGS

The twenty-five recommendations presented to the Committee on Administration of Training Programs are the outgrowth of the major study which Greenleigh Associates made for the Committee.

The findings which underpin each recommendation are stated in Chapter II in capsulized form, and set forth in additional detail in the other text chapters.

The order in which the recommendations appear is no indication of their rank in importance. The recommendations begin with subjects or procedures which have general application to all the training programs. For example, manpower policy and funding procedures are matters which encompass all training programs. So is the Employment Service, this being an agency which interacts with all the training programs.

The general recommendations are followed by recommendations which apply to specific programs or groups of programs (e.g., MDTA, programs for welfare populations, etc.).

1. A SINGLE CABINET-LEVEL AGENCY?

Consolidation of program administration in a single Cabinet-level agency, newly formed or existing, is not desirable or appropriate at this time.

- Specific administrative and statutory changes, as recommended hereafter, should be made.*
- In the future, programming and funding of any new programs should be incorporated into the existing administrative framework.*
- Rather than stripping away existing programs by legislative action, delegation of programs by agreement should be encouraged.*

Single-agency consolidation is not recommended at this time because it would not solve the grave problems of lack of coordination and fragmentation. The problems arise from many specific causes. They are not attributable to the single circumstance that several Cabinet-level departments are presently involved in program administration. The problems would persist even in a single Cabinet department unless specific remedies were invoked. These remedies do not require consolidation in a single Cabinet department.

Single-agency consolidation would in itself create new problems. It is likely that consolidation might produce relationships as complicated and unsatisfactory as the existing ones. First, a single agency would require several bureaus, perhaps not many less than are presently involved in the several agencies. And interbureau relationships can be almost as intricate as interagency relationships.

Secondly, reallocation of programs to a single agency will involve very difficult choices. Many programs are multifaceted, and not discretely "training" or "education" programs. The more sweeping the reallocation, the more elephantine the "single" agency would become. The

more sparing the reallocation, the more persistent the number of agencies would remain, with the same need as at present for developing interagency relationships.

At best, consolidation would have its own share of awkwardness and confusion in disrupting established administrative lines and developing new administrative arrangements. As Whitney Young pointed out at the September 25th meeting of the Committee on Administration of Training Programs, in demurring at the prospect of a single Cabinet-level agency for all training programs, everyone would have to begin groping his way through a new maze, and painfully acquired knowledge of the "ropes" would become obsolete.

Additionally, consolidation would take away the real advantages which adhere to the present multi-agency administration. Awkward as it is, and urgently needing changes short of complete consolidation, the present distribution of program administration does utilize the special expertise of Labor in manpower, HEW in education and welfare, and OEO in the explosive problems of poverty and social disadvantage.

Some of the awkwardness may diminish after a little more administrative experience with very new situations. Most of the programs have been in operation for less than three years. Many of the administrative arrangements have been in effect for only a few months.

Finally, and solely for perspective on the issue of single-agency consolidation, it should be noted that the absence of such consolidation is not unique to job training programs. Administration is not neatly centralized in other important areas of government, many of which involve activities of much longer standing than job training.

2. MANPOWER POLICY

A national manpower policy should be articulated, setting forth goals and establishing priorities for various target populations and for different types of training. The policy should be both long-range and immediate. It should include a commitment to solve the problems with which manpower policy is concerned. The President's Committee on Manpower should develop the national manpower policy, with the assistance of whatever task force it designates.

One of the confusing elements in the present array of training programs is that goals, targets, and priorities are not clearly understood for many programs, and hardly understood at all on an interprogram basis.

It is true that the separate pieces of manpower legislation enacted by Congress since 1962 express, pragmatically, national manpower policy. And in a sense priorities are ordered by the relative size of appropriations Congress authorizes for various programs.

There is however no clear expression on crucial policy questions. For example, is the national manpower effort to focus on the supply side or the demand side? If both, what should the mix be? Are the disadvantaged to be the main target of the manpower training effort? Or the youth? Or any other group?

More precise policy articulation can provide needed direction for the drift of manpower policy. Moreover, it is indispensable in developing criteria to test program effectiveness. (The Greenleigh Associates study found, as discussed in a later recommendation on Evaluation, that the lack of effective evaluation was widely acknowledged to be a shortcoming in existing programs.)

The recommendation that the President's Committee on Manpower delineate policy is based on its special capability. PCOM brings together all Cabinet members concerned with manpower policy. Their stature and outlook

qualify them eminently for the difficult task of formulating manpower policy. The thorniness of the task may be gathered from Appendix I, which summarizes observations on policy by various manpower specialists.

Policy formulation is no guarantor of policy implementation. However, PCOM is probably as aware as any group, in or out of the government, of the need for meshing actions with declarations.

3. THE EMPLOYMENT SERVICE

Far-reaching legislative changes are needed to transform State Employment Services generally into more effective arms of manpower programs. The recommended changes include:

- Separating the employment service function from the administration of unemployment compensation, to the fullest extent feasible.
- Substantially upgrading personnel through improvements in employee standards, salaries, and training.
- Increasing the level of financial support for the manpower functions of the Employment Service, to the extent necessary to carry on the functions adequately.
- Far-reaching evaluation and review at the Federal level of how State resources are used to carry out ES manpower functions.
- Appropriate means by which the Secretary of Labor can effectively implement Federal policy at the State level, with respect to ES manpower functions.

To the extent possible under present statutory arrangements, State Employment Services should be encouraged and assisted in:

- Extending and improving outreach activities, including more outstationing in local training programs and more ES facilities in deprived areas (Neighborhood Service Centers, Apprenticeship Information Centers, Youth Opportunity Centers, Adult Opportunity Centers).
- Developing more capability for operating as a comprehensive manpower service agency.

Most administrators of training programs have little contact with other programs or projects. But they all have some relationship with the Employment Service, and it is very often an unsatisfactory one. In the course of the Greenleigh study, widespread criticisms of ES were expressed; in fact, no other subject was as universally and bitterly mentioned. Charges were frequently made that ES personnel in local offices were indifferent, incompetent, or hostile in dealing with disadvantaged persons; local projects insisted that their own outreach, counseling and placement activities were not duplicating ES, because ES simply did not or could not serve their trainees. The validity of the complaints could not be proven or disproven within the scope of this study, but ES shortcomings were vividly described over and over again from project to project and city to city, even in States where great strides have been made by the Service.

Our own observations indicated much variation in ES practices from one city and State to another, and even within the same city. We found numerous instances in which ES activity was vital and valuable in the local manpower effort, along with instances where it was ineffectual or even a complicating element.^{1/}

^{1/}Two illustrations of the extreme variation in ES ambience are cited, from widely-separated geographic areas. In the entry room of the main office of ES in Miami, there is a posted sign: "Spanish is not spoken here. Bring an interpreter."

In the State of Oregon, ES staff are trained to provide a full continuum of services for NYC and WEP-Title V trainees. Orientation includes: "...develop within each trainee a feeling of belonging to the Department of Employment, a feeling of being wanted and useful, and a feeling of acceptance as a member of the Department of Employment family." (Training Program for Neighborhood Youth Corps and Work Experience & Training Students, State of Oregon, Department of Employment, Personnel and Training Section.)

Often ES was blamed for shortcomings not of its own making, e.g., insufficient slots, delays in MDTA machinery due to exogenous factors, etc. Frequently when ES was found wanting, it lacked resources and capability but not the will to meet needs of training programs in its community. Inevitably, ES's great visibility in the manpower picture exposes its every weakness mercilessly.

Long before the proliferation of training activity propelled ES into a more critical role in the labor market, thoughtful examinations of the ES administration found that substantial upgrading was required for its personnel and operations. The most recent study of ES operations concluded on December 23, 1965, with a Task Force report submitted to the Secretary of Labor.^{2/} Excerpts from the report are appended here as Appendix II.

The Task Force made its recommendations within the constraints of a Federal-State system, calling for
(a) further separation of ES administration from Unemployment Compensation; (b) improvement in the quality and compensation of ES personnel; (c) financing ES manpower

^{2/}The fifteen members of the Task Force included management, labor, and public representatives. Dean George P. Shultz of the University of Chicago, Graduate School of Business, was Task Force Chairman.

functions from general tax revenues.^{3/} (There were many other recommendations; these seem most relevant to the deliberations of the Committee on Administration of Training Programs.)

The problems that the Task Force identified still remain, the Greenleigh study found. Their solution is urgent for the best operations of job training programs, as well as for the best operations of ES itself.

As for the Task Force's specific recommendations, it is possible--as one observer noted^{4/}--for informed men of

^{3/}Discussing the recommendations at the 1966 conference of Berkeley Unemployment Project, Dean Shultz commented: "*Why not federalize the Service?* This is recommended by such groups as the AFL-CIO, the President's Commission on Manpower, Automation, and Technological Change, and the White House Conference on Civil Rights. Why not join the parade?

"The Task Force, addressing itself to questions of what might be useful in the immediate future, chose to concentrate on key problems and possible solutions within the framework of a federal-state system. It was our belief that a great deal could be done within that system to work out central issues...

"...we identified what we felt were the key problems of organization, personnel administration, finance and budgets, and interarea clearance. We then went on to see whether, within the framework of the federal-state system, reasonable solutions could be found for the problems. It seemed to us that the answer is 'yes,' given good fortune on the legislative and administrative fronts...

"Of course it is true that certain goals would be much easier to achieve under a unified federal system...Nevertheless, it is far from true that all the arguments fall on that side of the ledger...Overcentralization in the administration of manpower programs can be as great a problem as the reverse." Toward a Manpower Policy, ed. Robert Aaron Gordon (New York: John Wiley & Sons, Inc., 1967), pp. 174-175.

^{4/}See Appendix III, Excerpts from Professor Parnes' Appraisal of the Employment Service Task Force Report.

good will to disagree. The recommendation for physical separation of the ES and Unemployment Compensation administration in every single location has been seriously questioned, in view of the fact that there are so many small offices. The recommendation for financing ES manpower functions from general tax revenues has been viewed by Parnes and others as 'giving up an assured source of funds from the unemployment insurance tax for the vagaries of Congressional appropriations.'^{5/}

Many of the recommendations of the Task Force were incorporated in the Employment Service Act of 1967, which failed to pass. In the absence of statutory change, there has been some administrative response to ES problems and

^{5/} In any event, there is no legal requirement for giving up the tax and there is presently statutory authorization as well as precedent for supplementing the tax funds from general revenues. Robert C. Goodwin, Administrator of the United States Employment Service, advised on this score in a letter to Greenleigh Associates, Inc., dated January 3, 1968: "...the employment service may be financed from Federal unemployment taxes regardless of whether it is separate from the unemployment insurance program. It should be further noted that the section of the Wagner-Peyser Act quoted below authorizes additional appropriations from General Revenue...

Sec.5.(a) There is authorized to be appropriated, out of any money in the Treasury not otherwise appropriated, such amount from time to time as the Congress may deem necessary to carry out the purpose of this Act."

challenges. The most notable example is the Human Resources Development program, initiated late in 1965.^{6/}

Operations of the Employment Service, and the extent to which it serves the disadvantaged, have recently been

^{6/} How the program operates in some major cities was reported in the November 1967 issue of Area Trends in Employment and Unemployment, BES, USES, "Numerous Employment Service Programs Assist Disadvantaged Workers," pp. 15-22:

"It [HRD] is a comprehensive program of manpower services designed to improve the employability of disadvantaged adult workers living in urban slum areas and rural pockets of poverty. Individual services, on a case-by-case basis, are provided to such workers according to their particular needs. 'Outreach' stations in many areas are used to find these individuals and persuade them to return to the job market after suitable preparation...

"Nearly 7,850 persons were served [in Chicago] under the HRD concept of outreach in August 1967...During the month of August, 3,400 disadvantaged persons were served under Detroit's HRD program...In the 12 months ending with August 1967, the Philadelphia outreach program, through its 22 main stations and 2,200 auxiliaries, contacted nearly 11,700 individuals, referring nearly one-half to the Employment Service office...The ES is recruiting 1,375 persons in Los Angeles, San Bernardino, Riverside, Orange, and Ventura counties for on the job training and English language instruction. The ES will also assist in gaining the cooperation of some 1,000 private firms which are expected to participate in the project..."

scrutinized by the President's National Advisory Commission on Rural Poverty. The Commission's recommendations include a series on the Employment Service.^{7/} Some are similar to those advanced by the Task Force, particularly with respect to separating the Employment Service and Unemployment Compensation. But the Commission goes much further, in substance and in tone, recommending:

That the Federal-State Employment Service be reorganized to form a national unified system with appropriate assignment of responsibility and authority at the Federal, regional, State, and local levels. If it is necessary to federalize the employment service to implement fully a comprehensive manpower program in all areas, the Commission would endorse such a measure.

In this study for the Committee on Administration of Training Programs, it obviously has not been possible nor even appropriate for the contractor to explore all the considerations involved in the Federal-State Employment Service structure. These go far beyond the job training programs which are the focus of this particular study.

Nevertheless, recommendations on the Employment Service have been offered to the extent indicated by the Greenleigh Associates study of training programs. First, because the study underscores the fact that the Employment Service--despite the advances it is making--is still not serving adequately the Nation's job training efforts. Second, because a high-level Employment Service, with its network of almost 2,400 offices and 66,500 employees throughout the country, is crucial to the success of the manpower programs.

^{7/}See Appendix IV, Excerpts from the Report by the President's National Advisory Commission on Rural Poverty.

4. EQUAL OPPORTUNITY

It is essential that all minority groups receive full and equal access to job training opportunities. An office should be established within the Department of Labor to expedite and implement equal opportunity in all federally supported manpower programs.

One of the most persistent criticisms of manpower training programs is that they do not meet the needs of members of minority groups. Their needs are so great as to constitute "a crisis within a crisis."^{1/} The dimensions of the unemployment problem among Negroes remain staggering, even though some progress is being made. The unemployment rate is almost double the rate for white workers. It is most striking among teenagers, with one out of four Negro youngsters unable to find jobs. Almost two-thirds of all Negro workers are in low-skill, low-pay, and/or dead-end jobs.^{2/}

^{1/}"... 'The Negro problem' represents a crisis within a crisis, a specific and acute syndrome in a body already ill from more general disorders...we cannot deal with Negro unrest without remedying social defects that extend far beyond the Negro problem." Max Ways, "The Deeper Shame of the Cities," Fortune, January 1968, pp. 133-134.

^{2/}"During the past decade, employment gains for Negro workers have been substantial...Nevertheless, in 1966 two-thirds of all Negro workers were employed in semi-skilled, unskilled, or service jobs...The unemployment rate for Negro workers has been about twice as high as that for whites since 1954...The unemployment rate for Negro teenagers...from 1958 through 1966...remained between 24 and 30 percent. In other words, 1 out of 4 Negro youngsters seeking work is unsuccessful." Susan S. Holland, "The Employment Situation for Negroes," Employment and Earnings and the Monthly Report on the Labor Force (U. S. Department of Labor, Bureau of Labor Statistics), September 1967, p. 11.

It is wasteful and inefficient to mount manpower training programs which do not come to grips with the training and employment needs of the most severely disadvantaged. Opening the doors to jobs and training opportunities for minorities who are "shut-outs" from the labor market is a matter of the highest and most urgent priority.

Comments in many different areas, to the Committee as well as to the Greenleigh Associates study staff, charged that:

- Effective access to training opportunities is often denied because programs are not oriented toward meeting the needs of minorities.
- Frequently minority members who have completed a training program cannot be placed in training-related jobs in private industry.
- In some instances manpower programs discriminate against members of minority groups by withholding admission to local projects.

Similar comments were made by disadvantaged whites, about their own situation in training programs. But the charges were leveled more frequently and more vigorously by Negroes, Puerto Ricans, Mexican-Americans, and Indians. The grievants spoke with impressive conviction, often with moving eloquence.

The complaints did not originate solely from trainees or would-be trainees. Criticisms, just as forthright, were voiced by numerous program administrators, white as well as non-white, in many of the cities surveyed.

Within the framework of this study it was not possible to establish the validity of the charges with indisputable documentation. Even in regular courts of law and agencies assigned to civil rights problems, such documentation is very difficult.

Nevertheless, the insights acquired in the Greenleigh study are useful and relevant:

.There were indications that programs were not always oriented toward meeting needs of minorities. One example is the outreach function; the inability of old-line agencies to reach into ghetto areas requires (and resulted in) outreach activities by local projects and organizations. Another example is the inadequacy of supportive services; without these, minority persons are often unable to participate successfully in training programs. More fundamentally, the programs with low-level offerings are often scorned; even the most disadvantaged minorities have job aspirations which go beyond fry cook or janitor.

All of these shortcomings, and others, are the subject of specific recommendations in this report (e.g., more supportive services, better linkages among training programs, higher quality in job training, etc.). The shortcomings are mentioned again in this context because they affect most harshly the most disadvantaged, who are most frequently found in minority groups.

•There is considerable credibility in the charges that minority persons could not move from training to employment in industries and communities where the doors have been slammed shut for many years. Like everything else in the manpower training effort, examples can be found on both sides. In many communities employers are opening the doors, and striving like men of good will everywhere to overcome the shame and waste of discrimination. The strides that have been made are not gainsaid by the acknowledgment that much remains to be done before private industry is truly "the employer of first resort."

•Discrimination (in the blatant form of barring a minority member from a particular program solely by reason of race or nationality) was not clearly encountered. In a broader sense, however, it was clear that the doors to training programs were frequently closed to minority members for reasons not intrinsically discriminatory--which nevertheless screened them out of programs. For example,

programs with eligibility standards requiring eighth-grade literacy often tend to exclude minorities. So do programs in inaccessible locations, i.e., far from the ghetto areas.

Two questions central to the problem of equal opportunity in job training programs may be posed. First, to what extent do violations of national policy and law (with respect to civil rights and fair employment practices) exist in manpower training programs?

Second, to what extent can the manpower training programs, as presently administered and animated, serve the victims of discrimination in the labor market?

The questions must be answered with due regard for the fact that their dimensions go far beyond even the major problems which are the subject of this study.

In any event, to whatever extent violations of national policy and law may exist in manpower training programs, they should be rooted out. The penalties and procedures in the Civil Rights Law and related agencies (EEOC, FEPC, etc.) should be invoked. Additional enforcement should be provided, as required. *At the same time, within the manpower training programs, every effort and every device should be utilized to remedy speedily and by persuasion any instances of discrimination.*

In general, and certainly at the Federal level, the national manpower training effort is animated by the conviction that the doors must be opened wide for victims of discrimination in the labor market. This is more certainly the case in 1968 than it was in 1967 and in earlier years; on this score the fledgling programs have done their share of fumbling, and hopefully are moving with more certitude now. The implementation of a training effort aimed to the disadvantaged requires many kinds of enabling provisions (funds, staff, program design, etc.). *One such provision should surely focus on the equal opportunity problem.*

The recommendation here for an office which would guard full and equal opportunity in all federally funded manpower

training programs is directed to this problem. It is not proposed as a panacea for the whole problem of discrimination. Nor is it conceived as a substitute for other agencies entrusted with a mandate to monitor Federal programs for evidences of discrimination.

The objective is to effectively expedite equal opportunity in job training for minority groups. This could be facilitated by a high-level office to which there is easy access for those with complaints of discrimination. Informal and flexible procedures may serve in investigating and remedying violations of equal opportunity, so long as the high-level office itself has swift access to the decision-making and sanction-applying levels within the Federal government.

Over and over again in the course of the Greenleigh Associates field study, individuals concerned with the problems of equal opportunity in manpower programs urged that "red tape" be cut, that a "hot line" be run from the local community to Washington, that "somebody up there" be made alert to the road blocks in the field. Their formulations underscore the requirement for flexibility and authority in whatever procedure is instituted to remedy gaps and lags in equal opportunity.

It would probably be advisable to locate the office within one already having major responsibility for a broad spectrum of manpower programs, such as the Manpower Administration in the Department of Labor, and high enough in the table of organization to be influential. The Manpower Administration is mentioned because of its extensive role in the CEP program, as well as in most other major manpower programs. Such a location within the administrative structure would serve both to emphasize the importance of the function and to increase the likelihood that equal-opportunity determinations will have effect.

An important part of the responsibility would include preparation of an annual report on the progress of equal opportunity in training programs, for inclusion in the Manpower Report of the President which is transmitted to Congress each year. What is sought is not a hortatory report, but sober reporting with as much documentation as possible.

The administrative structure for expediting and implementing equal opportunity should be kept as simple as possible, since flexibility and expeditious action are sine qua non. Some experimentation with administrative structure is in order, to devise the most effective procedures.

It is not contemplated that the responsibility would be imposed on one person alone. Whoever is designated at the Federal level could delegate investigative responsibilities to representatives at whatever level in the administrative structure he deems appropriate. He would not take over functions of related officers (for example, the liaison functions with EEOC, etc., which are the responsibility in the Manpower Administration of the Special Assistant for Equal Opportunity in Manpower Programs). He would provide a necessary back-up for the newly-designated Regional Manpower Administrators who have, as one of their major responsibilities, assuring that training programs in local communities do serve the disadvantaged. He would not require a field organization paralleling their structure, but he should be provided with whatever assistance is required at the local level.

In short, the recommended office could make some contribution to the crucial problem of equal opportunity in manpower training programs without duplicating or complicating the administrative structure. *Equal opportunity is so vital in manpower programs that every useful approach and device should be enlisted.*

5. THE LEVEL OF FUNDING

Resources for training programs should be expanded, with funding sufficient to make significant inroads in the problems they seek to remedy.

Many of the problems which plague the administration of training programs and result in inefficient operations come about because there simply is not enough financial support. Funds appropriated for training programs make it possible to meet only a very small portion of the needs of unemployed and underemployed in the labor force, let alone employable or trainable persons outside the labor force. Nor are funds at all adequate for training which could remedy skill shortages and fill jobs now vacant.

The dimensions of need are discussed in Chapter VI. The most gross estimate indicates that less than 10 percent of persons needing the job training programs can be enrolled in them. What this means is that far less than 10 percent are actually enrolled. Everywhere the Greenleigh study touched, it was clear that the efforts of all the programs combined were miniscule in relation to the needs of the community. Even if the programs were operating with optimal efficiency and coordination, they would still constitute a very modest effort.

There is no efficient way of applying a band-aid to a gaping wound. This is what the national manpower training effort is trying to do. In the process the Federal administrators (and administrators at all other levels) resort to reshuffling of funds from one needy area to another and devising stratagems for putting the money where it is most needed, even where it involves

cutting off funds from areas which also have needs.^{1/}
The money runs out before even the direst needs can be met, in any particular State or local community or individual project.

There is not enough available to meet the needs of the half-million hard-core unemployed whom the President calls "our forgotten labor force."^{2/} There is not enough available for the remedial education and supportive services and post-training follow-up which are essential for an efficient manpower program. There is not enough available for the staffing and evaluation of projects to assure efficient operations. There is not enough available for training and education in the places which are generating training needs at a rate which engulfs the generating of training programs, as for example in the ghetto sections, rural areas, the South, etc.

^{1/} "President Johnson has ordered a reshuffling of \$134-million in antipoverty funds, mainly to bolster adult work programs in the slums.

"As a result, the Office of Economic Opportunity will have to cut its allocations for youth training and employment programs and for a variety of services to the poor.

"Of the \$134-million ordered transferred, about \$106-million will be added to the programs administered by the Labor Department under a delegation of authority from the poverty agency.

"The reallocation deals with money that Congress recently appropriated for the fiscal year that is half gone...a high official source said this was one way to solve a budget problem that was created when Congress appropriated \$1.773 billion instead of the \$2.06-billion requested.

...Another source said he thought the President was trying to select areas of promise, and sharing limited funds with them." New York Times, January 10, 1968, p. 25.

^{2/} In remarks at the swearing-in of the new Under Secretary of Commerce, President Johnson referred to the "stubborn problems that plague this Nation," mentioning the challenge to "try to hire and to train the half-million hard-core unemployed" whom he called "our forgotten labor force." Washington Post, December 1, 1967, p. A2.

There are economies of scale in manpower training as well as in other activities. If the national manpower training effort is foreclosed from the economies of scale, it must continue to operate on what is virtually an experimental and demonstration basis, and expectations for efficiency would necessarily have to be scaled down.

6. DURATION OF FUNDING

A time period longer than twelve months is desirable for funding programs, along with simplification of the refunding process.

Efficiency is hobbled throughout the manpower training effort because of the uncertainty of funding. The problem is direst for the programs which originate under the Economic Opportunity Act, because these are the more controversial programs and Congressional support is most uncertain. The one-year funding period is not invidious, in view of the same period which applies to such long-established programs as Vocational Education and Vocational Rehabilitation. But the hardship of uncertainty exists for the newer training programs, where it is absent for older programs which can be confident of continued Congressional support.

It is difficult to make plans on a one-year basis, particularly if the programs are to be oriented to continued operations and long-run goals. The difficulty is totally complicated by the lag in Congressional appropriations and the stringencies of Federal budgeting. The OEO budget for fiscal 1968 was not approved until December 15, 1967. Fiscal 1968 appropriations for HEW and Labor were made only at the end of October 1967. (Nevertheless, the largest job training program--MDTA--was still held up in its fund utilization at the end of 1967. The administrative requirement for budget-saving was thwarting access to MDTA reserve funds. As a result a new and presumably temporary requirement was in effect, necessitating approval of all MDTA projects at the Federal level. This makes planning at the State and local levels virtually impossible.)

The Greenleigh Associates study encountered serious problems linked to the one-year funding in almost every project. Frequently a project was on a seemingly endless treadmill, filing applications for the next fiscal year before it received funding for the current fiscal year. Program and project administrators complained constantly

and heatedly that the one-year funding cycle, within the context of uncertain Congressional support, made a mockery of planning. Staff could not be assembled, trainees could not be enrolled, inefficiency was inevitable.

The one change in program administration which is likely to yield the greatest dividends in program efficiency is this matter of funding duration. If Congressional caution were coupled with a more generous time period, such as eighteen or twenty-four months, it would greatly facilitate operations at every level, especially at the community level.

A related change, which does not necessarily require legislative action, would be facilitating refunding procedures for local projects of demonstrated value. (This links up with later recommendations here on Evaluation and Reporting.)

7. FUNDING PROCEDURES

Funding procedures in all programs should be streamlined, with a view to:

- Simplification;*
- Reduction in the number of steps required;*
- Delegation of decision-making powers of Federal agencies below the national level, to the extent feasible;*
- Reduction in the amount of time required for processing.*

The intricacies of program funding are discussed in Chapter IV. The cumbersomeness of the procedures cannot be fully appreciated without the kind of "front-line" reporting encompassed in the Greenleigh Associates study. Experienced bureaucrats, as well as "nouveau" project administrators, reported exhaustion and bafflement in fighting their way through the labyrinth of Federal funding procedures. The amount of time and energy which has to be expended in the process of funding local projects is unquestionably wasteful and inefficient, for sponsors of local projects as well as for administrators at every level. It is particularly wasteful when staff resources are so limited, and when delays in beginning program operations can be almost disastrous.

A meticulous concentration on the subject of funding procedures is urgently required. It does not call for new capability. Within the existing administrative structure in Washington there are already interbureau and interagency committees which can take a hard look at the present funding procedures, rationalize them, and simplify them. Federal administrators are well aware of the problem, and have instituted some changes. Their efforts in this direction must be greatly accelerated and extended, in light of the findings here. Legislative obstacles to simplification should be brought to the attention of Congress promptly.

8. FUNDING FOR MDTA MULTI-SKILL CENTERS

Annualized funding should be available for MDTA Multi-Skill Centers without the necessity of funding on a course-by-course basis.

Multi-Skill or Multi-Occupational Centers are being used increasingly for MDTA training. They are subject to a funding procedure devised for programming single occupational courses developed for one-time operation. It is anachronistic, wasteful, and inefficient to require course-by-course approval for a training facility set up for the express purpose of operating continuously for the sake of efficiency.

The East Bay Skills Center, with its thirty-two budgets at the time of the Greenleigh examination, provides a good example of the need for the recommended funding change. The present fractured funding requires fiscal manipulation of almost unbelievable complexity. Trainees must, of course, be tied to a specific budget, and even overhead costs (janitor services, utilities, etc.) pro-rated against the occupational budget. These prorations must be adjusted periodically as the gross enrollment at the Center varies.

But the fiscal and accounting problems are perhaps the least important to the operation of the Center. Both program and cost considerations are involved, as is staff morale. There is a tendency to continue an unsuccessful or outmoded program rather than modify or cancel it, because of the administrative difficulties involved. Costs are inflated because instructors must be hired under hourly rates for only the duration of the specific course, at an hourly rate (\$8.00) much higher than applicable for tenured teachers.

The fact that teachers cannot be hired under tenure rights raises morale problems, despite the high hourly pay rates. Sick and vacation leave cannot be accumulated from one short term contract to another, and there may or may not be holiday pay. A strike over

these issues was narrowly averted in the East Bay Skills Center late in 1967.

Basically, what is needed is an annualized program and budget with a modest degree of flexibility, with stability in staff, continuous programming in key vocational areas, and ability to reassign trainees to alternate courses. Estimates of savings at East Bay under this set of conditions run at least \$250,000 a year, with program benefits not considered. If similar conditions exist in other centers (they apparently do), national savings would be substantial.

There is nothing in the Federal law which requires this fractured funding. Funding methods are by administrative order only, and can be changed. The change, with whatever programmatic safeguards are required, is within the capability of the Labor-HEW Coordinating Committee. Both agencies should logically participate in finding a rational solution to a problem which results in wasteful operations of MDTA Multi-Skill Centers.

9. CROSS-FUNDING

Procedures should be developed to facilitate cross-funding of programs and program services.

The need for sequential links in training programs, and for an array of supportive services, is generally recognized. It requires better program coordination (the subject of later recommendations here), for which a prime requisite immediately is a mechanism which facilitates cross-funding.

The Greenleigh study found that in many localities resources were wasted, because programs whose effectiveness would have been enhanced through joint operations were instead operating alone and inefficiently. One example is in Oakland. The East Bay Skills Center in Oakland was so starved for funds for adult basic education that it had to retreat from its original plan for serving persons below the fifth-grade literacy level. At the same time adult basic education programs were available to a limited extent in the school system, funded under Title III of the Elementary and Secondary Education Act; these offerings were presumably serving persons in need of literacy training, but not demonstrably reaching persons who needed remedial education to assist their employability. (The broader subject of the Adult Basic Education program per se is discussed in a later recommendation here.)

Because cross-funding is so difficult, most program administrators do not even attempt it. The more valiant ones are inspired by the possibilities in joining meagre resources for more effective returns, but are rarely able to overcome all the obstacles in cross-funding.

The Concentrated Employment Program represents, in a sense, the triumph of cross-funding. CEP does bring together funds from different program sources for concentrated utilization. It is able to do so by dint of the special skills and expertise of the Manpower Representa-

tives who carry on all the intricate negotiations and maneuvers which cross-funding presently requires.

Even CEP's effectiveness could be enhanced by a general facilitation of the cross-funding procedure. Hopefully, such facilitation could be extensive enough to bring the benefits of cross-funding to areas not yet reached by CEP.

Implementation of this recommendation is within the capability of the existing administrative structure, along the lines discussed in the earlier Greenleigh recommendation on Funding Procedures. Here too, implementation of the recommendation would greatly increase program efficiency and effectiveness, even in the absence of the more fundamental changes that are required for thoroughgoing program coordination.

10. GRANTS FOR PLANNING

Planning grants should be made available to State and/or local governments for the development of comprehensive manpower plans, incorporating education, work and training programs, with the necessary sequential linkages, and related manpower services.

The lack of advance planning and the fragmentation of training efforts at the local level are among the clearest facts to emerge from the Greenleigh Associates study. In the absence of planning it is not unusual that programs are established which do not meet the total employment needs of the local population (or the fraction of the population reachable within funding constraints), and that there are no complementary programs to supplement or follow an original training experience.

Such situations were widely encountered in the Greenleigh study. A frequent question from program administrators--especially in basic education, youth, and work experience programs--was, "Where do they go from here?"

Comprehensive planning, both immediate and long-range, is needed to develop programs to meet existing and projected needs, and also to develop sequential linkages among programs. Such planning will also permit rational decisions on priorities among various needs in a given community. Planning will facilitate funding an overall training effort in a locality, rather than unrelated fragments.

The acute problems of large urban areas particularly require comprehensive planning based on functional geographic lines, for they may be unique pockets encompassing one or more cities within one State or may cross State boundaries.

In recent legislation, Congress has provided for comprehensive planning grants in Health Services and in the Model Cities program. (Planning grants for Mental Health, Mental Retardation, and Vocational Rehabilitation are also available under recently enacted laws.)

As for manpower training programs, Congress has given the nod to planning in the December 1967 amendments to the Economic Opportunity Act:^{1/}

The Director [of the Office of Economic Opportunity] shall designate or recognize community program areas for the purpose of planning and conducting comprehensive community work and training programs.

...The Director shall consult with the heads of other Federal agencies...to encourage the establishment of coterminous or complementary boundaries for planning purposes...

...It [a comprehensive work and training program] shall provide a systematic approach to planning and implementation including the linkage of relevant component programs authorized by this Act with one another and with other appropriate public and private programs and activities...

...For each community program area, the Director shall recognize a public or private nonprofit agency which shall serve as the prime sponsor to receive funds... This agency must be capable of planning, administering, coordinating, and evaluating a comprehensive work and training program...

...The Director may provide financial assistance in urban and rural areas for comprehensive work and training programs or components of such programs, including the following:

...means of planning, administering, coordinating, and evaluating a comprehensive work and training program.

The Greenleigh recommendation here for planning grants looks to:

- Widening the Congressional sanction for planning to encompass all manpower training programs and other programs related thereto, not only those originating under the Economic Opportunity Act;

^{1/} Excerpted (with underlining supplied for emphasis) from Public Law 90-22, 90th Congress, S.2388, December 23, 1967, "Part B - Work and Training for Youth and Adults," Sec. 121, Sec. 122 (a), Sec. 123 (a) (9).

- Implementing the sanction for planning in the most effective manner possible.

Innovative funding patterns for Federal grants exist in both the Model Cities and the Health Services legislation. The receiving agency for Federal grants may be a State agency or where appropriate may be a county, municipal, metropolitan, or other public body.

The Demonstration Cities planning grants go directly to local agencies.

In the Comprehensive Health Planning amendments, area-wide agencies (which may encompass logical areas within a State or parts of two or more States) may apply for area-wide planning grants, whether or not the respective State or States also have comprehensive health planning. Where a Comprehensive Area Plan exists, the relevant State agency is to consider its recommendations in its own planning and in allocation of funds for health services.

For the purposes of planning manpower programs, the system preferable is one in which grants can be made available both for State-wide planning and for comprehensive planning within appropriate subdivisions (whether cities, metropolitan areas, counties, or multicounty districts).^{2/}

^{2/}This concept of subdivisions accords with Congress's formulation in the Economic Opportunity Amendments of 1967 (P.L.90-222, op. cit., p. 12):

Sec. 121.(a) The Director shall designate or recognize community program areas for the purpose of planning and conducting comprehensive community work and training programs.

(b) For the purpose of this part, a community may be a city, county, multicity, or multicounty unit, an Indian reservation, or a neighborhood or other area (irrespective of boundaries or political subdivisions) which provides a suitable organizational base and possesses the commonality of interest needed for a comprehensive work and training program...

As in both Model Cities and Comprehensive Health Planning, it would be appropriate that the planning agency be designated by the Governor, Mayor, or other responsible public officials in the respective jurisdictions. It would be desirable to include a proviso, similar to that in the Health Planning Amendments, requiring that the planning agency represent a cross-section of groups interested in manpower (labor, management, government, training institutions, etc.).

While specific project grants subsequently would be conditional upon the Comprehensive Manpower Plan, flexibility for modifications in the Plan to meet unanticipated needs should be maintained. This is a feature of the Comprehensive Health Planning amendments. (It is also discussed in the next recommendation here on Flexible Utilization of Funds.)

This recommendation for grants to plan comprehensive manpower programs does not intend that present and prospective manpower training activities should grind to a halt until and unless they can be preceded by planning. Rather, the recommendation seeks to encourage a transition to planned activity as speedily as feasible.^{3/}

^{3/} For example, Congressional action on the Economic Opportunity Amendments of 1967 (P.L. 90-222, Dec. 23, 1967, op. cit., p. 14) provided that:

Commencing July 1, 1968, all work and training component programs conducted in a community under this section shall be consolidated into the comprehensive work and training program and financial assistance for such components shall be provided to the prime sponsor unless the Director determines there is a good cause for providing an extension of time, except as otherwise provided by subsection (c). After that date, the work and training components of programs authorized by section 502 of this Act and by section 261 of part E of Title II of the Manpower Development and Training Act of 1962 shall to the maximum extent feasible be linked to the comprehensive work and training program, including funding through the prime sponsor where appropriate.

11. FLEXIBLE UTILIZATION OF FUNDS

In communities where manpower programs have been planned and funded on a comprehensive basis, up to 10 percent of the funding allocated should be available to the prime sponsor for use on a flexible basis, subject to strict fiscal and program accountability.

Quick responsiveness is an important element in manpower training programs. When trainees are available, training slots should also be available. When the local job market calls for certain occupational skills, those skills should be the training program's focus. Synchronization along these lines was often absent, the Greenleigh Associates study found, and many circumstances beyond the control of local program administrators were frustrating their attempts at responsiveness. Every recommendation in this report is addressed to this problem, particularly perhaps the recommendations on planning and coordination.

The recommendation for modest flexibility in fund utilization is a crucial adjunct to the planning recommendations. It would provide the kind of release from rigidity which is indispensable in a dynamic program, and appropriate in a comprehensive planned one. It would do so within limits which would not "open-end" programs to the point of jeopardizing faithfulness to the program's original design.

In many of the programs covered by the Greenleigh study, project administrators testified eloquently on the need for even a little bit of flexibility. There was clear evidence that waste and inefficiency could be avoided if rigidity were waived along the lines recommended here.

12. REGIONAL BOUNDARIES

To the extent feasible there should be consistent regional boundaries for related agencies involved in manpower training. Uniform cities for regional headquarters should be designated, whether or not complete uniformity is obtained in regional composition.

The administration and coordination of training programs is complicated by the variations in regional boundaries and by the different locations of regional offices of the Federal agencies involved. The extent of these regional differences is described in Chapter IV; a table displays the regional distribution of five relevant agencies.

The diversity in geographic areas served by the Federal agencies causes problems in administrative relationships within and among agencies. These problems may particularly interfere with any attempts at integrated planning of manpower-related programs for a region. A meeting to discuss a particular program in one region might necessitate calling regional representatives in several different cities, each concerned with substantially different areas because of overlapping jurisdictions for one or more States. To cite one example, a regional meeting to discuss complementary programs in the Kansas City region might require attendance by BWP and OEO representatives from Kansas City, BES and BAT regional representatives from Kansas City, Denver and Seattle, and HEW personnel from Denver and Kansas City.

Potential sponsors of training programs frequently find that they must contact agencies in different cities and substantially different regions. For an MDTA-Institutional project in Minneapolis going through State channels, Minnesota would contact the regional office of BEW in Kansas City (which handles the Midwestern Plains States) for approval of institutional training and would need Department of Labor assent from the BES Chicago office (which is responsible for the Great Lakes complex of States). Programs involving coordination or approval

by a larger number of agencies, such as Title V-Work Experience programs, would require transactions with a still larger and more widely dispersed group of regional offices.

The multiplicity of regions does not present simply a geographic or logistical problem to the would-be sponsor. Because any one State may be located in two or more very different groupings of States, it is possible that the chief concerns and priorities may vary in the different regional headquarters. A sponsor may have to deal in one agency with a regional office oriented toward a small array of primarily agricultural States, while the relevant regional office of another agency may be concerned with a large complex of highly industrialized and urbanized States.

The problem of administrative complexities resulting from regional variations encompasses more than the manpower agencies. The general problem has been under study by the Federal government at least since 1946; a study concluded very recently in the Bureau of the Budget, responding to the President's recent message on the quality of government, may produce some changes within the next year. Greenleigh Associates readily acknowledges that realignment of regional boundaries cannot be accomplished easily or arbitrarily. In many instances regional patterns may be based on truly functional considerations. Others, however, may have been determined for more capricious reasons or for historic conveniences, the logic of which no longer applies. It is necessary that the agencies' regions be reconstituted according to the criterion of the most rational administrative structure for performance of agencies' functions and implementation of national policy.

If it is determined that completely uniform regional boundaries for agencies involved in manpower programs would not be feasible, due to the functional requirements of a given Department's broader responsibilities, then other measures short of complete reconciliation should be adopted. These should include the designation of uniform regional cities. Perhaps subdivision or consolidation of larger and smaller regions could be used for the purpose of achieving consistent regional jurisdictions in manpower-related programs, if complete uniformity is deemed unwise.

13. INFORMATION

Channels of program information should provide easy access in every dimension:

- There should be a constant exchange of information within the government about program activities and procedures, geared to coordination at every level, and shored up by decision-making at a high enough level to overcome significant breaches of coordination.
- There should be a dependable flow of information to the field (to States and local communities and potential project sponsors) on the availability of programs and funds and the requirements for establishing projects. "One-stop" service should be available for applications, plans, and information.
- There should be a dependable flow of information to potential trainees in local communities, on the availability of training places and eligibility requirements. Information should be obtainable in all appropriate places (employment service offices, neighborhood service centers, post offices, public schools, welfare offices).

One of the saddest features of the national manpower training effort is the confusion which enshrouds it. As everyone suspected, but as no one now knows better than Greenleigh Associates as a result of this study, there is an incredible lack of information on the training programs.

To an alarming degree, program administrators are not knowledgeable about programs outside their jurisdiction and often not fully informed on the requirements and procedures in the very programs they are administering. Local people in government and in the community, who could be catalysts in bringing resources of Federal

programs to their locality, are often not aware of what is available or too baffled to engineer its delivery. The disadvantaged, and other persons whom the training programs are intended to serve, usually do not know what is available in their community and rarely find out where to go and how to apply for programs best suited for them.

It is through no fault of their own that administrators, potential sponsors, and potential trainees lack information and understanding of the Federal manpower training effort. It is an incredibly complicated ever-changing structure. The complications have been bared to the Committee on Administration of Training Programs in the summary tables and analyses of the Greenleigh Preliminary Reports. But, as the Committee knows, the summaries are the result of painstaking ferreting-out of information which was not available in any convenient form, and required an intensive and comprehensive professional analysis which crossed into every program and every level of government.

For persons who do not have the Committee's resources, there should be an easier way of acquiring information on the training programs. It is to this that the recommendations are addressed.

Hopefully the programs will become less complicated and easier to understand, if and when the recommendations proposed herein are implemented. Even under the best of circumstances the need for easy access to program information will remain. In any event, assigning the responsibility for dependable information flows to the Federal government may spur it to simplify requirements and procedures.

The information flow which is recommended is not a flow of documents. Everyone in and out of the government is heavily burdened with the reading of issuances, memoranda, reports, etc. It is not possible to proscribe for intergovernment circles the use of written communications, polysyllabic words, complex sentences, etc. But the recommendation for exchange of information within the government envisages as simplified a form of

communication as feasible. The mechanism for communication does not seem to require any new committees. The Economic Opportunity Council and/or CAMPS, or working subcommittees thereof, could provide the necessary channels.

The recommendation for a dependable flow of information to the field similarly intends that the mechanism be simple and convenient. Knowledgeable persons inside the Federal establishment should serve as expeditors and trouble-shooters, providing "one-stop" service along the lines promised to businessmen in the recently announced Five Cities (Ghetto Aid) Program.

Likewise, the recommendation for a dependable flow of information to potential trainees envisages convenient "one-stop" information centers. If precedent is needed, one exists in the experimental one-stop information centers on Federal programs.^{1/}

^{1/}"The White House announced that experimental one-stop information centers on Federal programs in Atlanta and Kansas City had been so successful that similar centers would be opened in Chicago, Boston, Denver, San Francisco and Fort Worth during the coming year.

"The centers help people who have problems and do not know which Federal agencies to turn to. The centers in Atlanta and Kansas City handle about 5,000 inquiries a month, directing people to the proper agencies for the solution of their problems." New York Times, November 26, 1967.

14. PROGRAM REPORTS

Reporting requirements from local projects to federal levels should be reviewed with a view to:

- Standardizing and simplifying the report forms,
- Assuring the reporting of data needed for monitoring and evaluation.

This recommendation is an adjunct to the next recommendation on Evaluation, insofar as it would provide much of the source material which evaluation requires. The recommendation is also a corollary to the earlier recommendation on information channels; a regular feedback from local projects to Federal levels, and a corresponding flowback to local projects is as essential as a dependable information flow within and out of the government to all concerned with manpower programs.

The Greenleigh Associates study found a paucity of data and a plethora of forms--a situation which may be characterized as wasteful and inefficient. All the projects maintained records as required by their funding agency, but every agency had different reporting requirements. These variations thwarted interprogram comparisons, because different bases, definitions, and time periods were used from program to program. Within programs it was rarely possible to conveniently retrieve crucial information on enrollees' characteristics, progress, and post-training status, and virtually impossible to identify dropouts for descriptive or analytical purposes.

Local administrators frequently expressed bafflement and curiosity about the disposition of their reports at the Federal level. They neither received comments from Washington nor a flowback of information on a program-wide basis. Many of the local project administrators were concerned that the records they maintained, as required, could not provide comprehensive data on program activities.

Reporting requirements and forms were the subject of a recent PCOM Task Force Report, "The Adequacy of Manpower Program Data Reporting Systems." The report made recommendations for individual programs, and identified a need for common definitions. There have since been considerable changes in reporting requirements, some of which may be attributable to the Task Force Report; not all the changes were operational at the time the Greenleigh Associates field studies were made. Despite the progress which has been made in individual agencies, data reporting systems remain inadequate for many programs and are largely noncongruent from program to program.

The same meticulous concentration on streamlining, as was recommended in the earlier recommendation here on Funding Procedures, is applicable for reporting requirements. It could be highly productive if it were undertaken with the thoughtfulness and urgency it merits. It is within the capability of the existing administrative structure.

A shift to congruent program data for all training programs would accord with Congressional preference, as expressed in the Economic Opportunity Act amendments enacted in December 1967:

Sec.132.(a) The Director [of the Office of Economic Opportunity] shall provide for the development and implementation of a program data system consistent with similar data systems for other relevant Federal programs. Such data shall be published periodically.

15. EVALUATION

Continuing evaluation should be provided:

- To gauge progress and identify shortcomings at the project level, as well as at the program level;*
- To serve as a basis for national policy decisions on allocation of resources;*
- To guide administrative decisions on re-funding individual projects.*

The meagerness of the present evaluation effort is widely acknowledged. It is conceded to be a serious weakness, and the need for extensive and critical evaluation of training programs is expressed at all levels. Even at the local level, many project administrators told Greenleigh field staff that they very much wanted to know the impact of their programs, and that the lack of information based on good evaluation was handicapping the best development of programs.

It is understandable that evaluations thus far have been very limited. The unavailability of funds, even more than the scale and recency of programming, has been a restricting influence.

The evaluation embodied in the Concentrated Employment Program currently may be a prototype for new directions in evaluation. The CEP is one of the new major programs, or--to be more precise--a new delivery system pulling together resources from several programs; CEP is considered one of the most promising of the program systems, and plans for its expansion are in the making. Meanwhile its initial operations had evaluation built into the program design. Outside professional consultants are conducting evaluations, their studies proceeding concurrently with the program's operations. This is the kind of evaluation design that has obvious value in decision-making and policy determination. It is indispensable for all programs.

Congress has made plain its conviction that carefully designed continuing evaluation is indispensable, by making it a requirement for programs arising under the Economic Opportunity Act as amended in December 1967.^{1/}

^{1/}In the Economic Opportunity Amendments of 1967 (P.L.90-222, Dec. 23, 1967, op. cit., pp. 12-14, 17), Congress provided that:

A comprehensive work and training program must seek to provide participants an unbroken sequence of services which will enable them to obtain and hold employment...It shall also provide for evaluation.

...This agency [the prime sponsor] must be capable of planning, administering, coordinating, and evaluating a comprehensive work and training program.

...The Director [of the Office of Economic Opportunity] shall prescribe regulations to assure that programs under this part have adequate internal administrative controls, accounting requirements, personnel standards, evaluation procedures, and other policies as may be necessary to promote the effective use of funds.

...The Director shall provide for the continuing evaluation of the programs under this part, including their effectiveness in achieving stated goals, their impact on related programs, and their structure and mechanisms for the delivery of services, and he shall arrange for obtaining the opinions of participants about the strengths and weaknesses of the programs. This evaluation shall include comparisons with proper control groups composed of persons who have not participated in such programs, and shall seek to develop comparative data on the costs and benefits of work and training programs authorized by this Act and by other Acts, including the Manpower Development and Training Act of 1962. He may, for this purpose, contract for independent evaluations of such programs or individual projects. The results of such evaluations shall be included in the report required by section 608.

The relevance of evaluation to renewing or supplementing financial assistance has also been endorsed by Congress.^{2/}

The requirement for program evaluation along these lines, which Congress has already established for programs arising under the Economic Opportunity Act, should be extended to all other training programs. It is equally appropriate and advantageous for programs arising under other legislation.

^{2/} Ibid., p. 17:

The Director shall develop and publish standards for evaluation of program effectiveness in achieving the objectives of this part. Such standards shall be considered in deciding whether to renew or supplement financial assistance...

16. STAFF TRAINING

Inservice training should be available for manpower program administrators (including staff of the Employment Service) at the Federal, regional, State, county, and local levels, along lines which would most effectively strengthen:

- Staff capability for program implementation;
- Interchange of information about manpower problems and program techniques;
- Coordination among programs, agencies and levels of government.

Three avenues of inservice training are recommended:

- Establishment of a National Manpower Institute within the Manpower Administration of the Department of Labor, with participation by all agencies involved in manpower programs;
- Expanded utilization of resources for training State, county, and municipal government officials in community service and continuing education programs at colleges and universities, subsidized by Title I of the Higher Education Act of 1965;
- Regular face-to-face briefings for operating personnel on the findings of research and experimental and demonstration projects, and the implications for policy, program and operations.

The shortage of experienced and trained personnel to administer programs is not endemic to job training programs. Nor is the pirating of good administrators a unique problem. Generally expanded activity in the public sector, much of it in new and untested directions, is straining the manpower resources of Federal, State and local governments everywhere. No matter how well conceived new poli-

cies are, they can founder for lack of trained talent to make the day-to-day implementation in the local communities. Recognition of this problem underlies the submission to Congress of the Intergovernmental Manpower Act of 1967.^{1/} Until and unless such legislation is enacted,

^{1/}On April 11, 1967, Senator Muskie (for himself, Senators Gruening, Hart, Inouye, Jackson, Nelson and Randolph) introduced S. 1485, which was referred to the Committee on Government Operations.

The bill "finds and declares a national interest in- (1) improving the quality of public administration at all levels of government, particularly in connection with programs that are financed in whole or in part from Federal appropriations; (2) strengthening the capacity of State and local governments to deal with complex problems confronting all levels of government; (3) aiding State and local governments in training their professional, administrative, and technical employees and officials; (4) aiding State and local governments in developing systems of personnel management that are responsive to the goals and needs of their programs, effective in attracting and retaining capable employees, and based on merit principles..."

The Act's provisions authorize "any Federal agency administering a program of grants or financial assistance to State or local governments" to "establish, provide, and conduct training programs for State and local employees and officials who have responsibilities related to the federally aided program."

It also authorizes State and local governments, from the grants or financial assistance when provided, "to establish, conduct, provide, and support training and education programs" for those who have "responsibilities related to the federally aided program."

The Act authorizes ("if training is not adequately provided for under grant-in-aid or other statutes") grants to State and general local governments "for up to 75 per centum of the cost" of developing and carrying out training and education programs for their employees.

The Act stipulates coordination "as needed to avoid duplication of programs providing for training and to insure consistent administration of related Federal training activities."

it is necessary to make whatever administrative arrangements are feasible for particular programs. The recommendations here are in terms of such arrangements for manpower programs.

It is particularly wasteful and inefficient to omit adequate staff training for manpower personnel. These individuals (including those in the Employment Service offices) have a high degree of direct contact with program participants, many of whom are so sensitive that they readily confuse staff inexperience or ineptitude with staff bias or hostility. The Greenleigh study encountered large numbers of manpower program administrators whose commitment and enthusiasm were a considerable offset for their inexperience. But these persons themselves often expressed a desire for the kind of briefings and guidance which could help them acquire expertise in advance of their on-the-job training.

Existing procedures for staff training are wholly inadequate. The Labor Department has perhaps more extensive arrangements than the other agencies in the manpower field, but its activities are very limited.^{2/} For some programs, like Neighborhood Youth Corps, there is some abbreviated crash training. Quarterly seminars on manpower policy are sponsored by OMPER for Department and other agency personnel. Very limited orientation is provided to BES and BAT personnel, including regional staff. There is no separate appropriation of funds for training; such costs are taken out of regular appropriations for salaries and expenses. State staff in State employment security agencies are trained with Federal funds; the appropriation generally approximates \$150,000 to \$200,000, although for fiscal 1966 there was a special appropriation of approximately \$2.5 million for training demands of Youth Opportunity Centers and Civil Rights Act. (The amount of the special appropriation for fiscal

^{2/}The summary which follows is from the description by the Manpower Administration on May 23, 1966, in a staff paper, "A National Manpower Institute," to the Subcommittee on Training of the National Manpower Advisory Committee.

1967 or 1968 is not known at this writing.) BES sets guidelines for both inservice and outservice training. Outservice training is given at institutes or in regular courses, generally at universities in the area of employment. Funds are concentrated on technical training in hard-to-fill jobs and for top management.

The inservice training recommended here does not contemplate full-time long-distance attendance which would drain programs of their vitally needed operating personnel. Rather, the recommendations emphasize short-term conveniently located facilities, which meet immediate as well as long-term needs.

The first recommendation for a National Manpower Institute envisages an institute which would operate some staff training programs directly, in Washington and other selected central locations, and would contract for others. The National Manpower Advisory Committee (comprised of manpower experts outside the government) has endorsed the concept of a National Manpower Institute within the Manpower Administration of the Department of Labor, at its January 1967 meeting. The Department's request to the Bureau of the Budget for the 1966-71 period included a request for funds to make feasibility studies for a National Manpower Institute.

The reasons for recommending that the Institute be established within the Manpower Administration of the Department of Labor are threefold:

- Consistency with the first recommendation here ("In the future, programming and funding of any new programs should be incorporated into the existing administrative framework.").
- Recognition of the large numbers of Employment Service personnel who would be included in the program.
- Precedent, to the extent of the Labor Department's present activities in training foreign personnel who are for the most part high manpower officials

of their governments. Labor now operates the International Manpower Institute, funded by AID, for two seminars of about three months duration for about 30 persons each; the budget is about \$500,000. Seminars are also conducted for domestic personnel who will be assigned manpower duties overseas.

The second recommendation for expanded utilization of resources generated by Title I of the Higher Education Act is an efficiency measure which properly transcends legislative separatism. Much of this is being done already.^{3/} More could be done.

The third recommendation, for face-to-face briefings for operating personnel on the findings of research and E & D projects, is a corollary of our two earlier recommendations for more and better evaluation of training programs,

^{3/} A press release from the Office of Education, dated October 8, 1967 (HEW-S16), stated: "Many State, county, and municipal government officials throughout the country are learning more about their jobs through a Federal program of community service and continuing education...The program, authorized by Title I of the Higher Education Act of 1965, provides \$10 million this year for projects that bring college and university talents to bear on community problems. Projects relative to government have been allotted \$2.1 million, more than 20 percent of the total...159 government-related projects are being operated by 111 institutions of higher education in 45 States. Continuing education is provided for personnel at various levels of government through training courses, seminars, workshops, institutes and conferences."

The press release cites examples of Title I projects, including "pre-legislative session seminars for legislators on urban problems," "workshop for government officials on industrial development problems," "seminars on community organization for executives of poverty, housing and related government agencies," and "development of model techniques in training county Office of Economic Opportunity agents."

and for constant exchanges of information within the government about program activities and procedures. It is peculiarly wasteful to invest time and resources in research and E & D without thoroughly communicating the results outside the confined research area, and without utilizing the findings to improve operations. The Manpower Administration in the Labor Department has some limited activity in this direction, and the other agencies have even less. The "bridge between inquiry and practice" has to be built and travelled.^{4/}

^{4/} "At the present time, effective means for translating manpower research into action are not too much in evidence. One Federal agency that has definitely striven to build a bridge between inquiry and practice is the Department of Defense. In almost every instance, research supported by the military is viewed as only half complete when the research team has finished its work and presented its report. The next step, or the beginning of the second half of the task, is to ensure communication of the research results to those individuals who must evaluate and eventually translate the research into action. A whole series of briefings is started. The most senior individuals responsible for the programs that logically relate to the research results take part in the early briefings. Additional briefings are conducted for individuals at the lower echelons.

"This concept is worthy of adaptation in manpower research funded by federal, state, and local governments. After the research itself has been completed, the research team should develop a suitable strategy of communication with the executives and others responsible for evaluating and eventually carrying out the manpower programs that the research seeks to aid..." Herbert E. Striner, "Research Strategy for Manpower Policy," in Dimensions of Manpower Policy: Programs & Research, op. cit., p. 239.

17. ON-THE-JOB TRAINING PROGRAMS

Shortcomings in the programs should be remedied:

- Duplication in job development activity,*
- Neglect of the disadvantaged,*
- Lack of meaningful training,*
- Inadequate supportive services,*
- Cursory monitoring,*
- Insufficient evaluation,*
- Excessive paperwork.*

The Manpower Administrator should give high priority to these problems, utilizing whatever assistance is most appropriate.

Increasing emphasis is being given to OJT in MDTA, and also in programs originating under EOA. Greater involvement in job training by the private sector is being advocated and encouraged.^{1/} Under these circumstances the need for remedying OJT's shortcomings becomes a matter of the highest priority.

^{1/} "The Johnson Administration has begun another program in its mounting effort to spur business to do more to hire the hard-core jobless.

"The program, outlined in letters to 400 employers in five cities...offers Federal manpower funds for recruiting and training the disadvantaged to companies that guarantee jobs to the trainees. The five test cities are Chicago, Los Angeles, Boston, San Antonio and Washington. [i.e., the five cities in the Ghetto-Aid Program.]

"...the Administration is considering a shift of some

The problem of duplication in job development is the most irksome, but not the gravest. There are competing agencies in the job development field at the local level. Some have statutory charters, others focus upon job development for particular clientele, and still others relate to a political entity. Although it is truly difficult to judge where healthy competition ends and needless duplication begins, the Greenleigh Associates study found that agencies in the job development field were frequently straying outside their loosely defined boundaries. Employers were often contacted by more than one job developer. Program administrators freely acknowledged the duplication. The extent of duplication was not measurable within the Greenleigh study design which did not include direct inquiries to employers.^{2/}

manpower money into programs that seek to involve business directly...Some sources said that the total could run into hundreds of millions of dollars.

"The new program will provide Federal funds to offset the cost of recruiting, educating, counseling, training and giving supportive help to hard-core jobless. The companies will be required to pay the workers during the training, and to keep them on the job after training ends.

"The contracts will run for 15 months. The Government will provide the companies with an 'incentive' payment at the end of 21 months to compensate them for the added cost of employing disadvantaged workers with low productivity or other deficiencies." New York Times, January 5, 1968, pp. 1 and 23.

^{2/} In one community where a Greenleigh analyst was conversing with an employer in a related inquiry, the employer mentioned that he had said "No" to three separate job developers, even though he really wanted to make room for OJT trainees. Each developer came from a different group (local government, trade union, civil rights organization). The employer felt that it would be unwise to disappoint any one of them.

Even if the stories--told to Greenleigh field analysts--of employers being contacted by 22 different agencies within one 10-day period are apocryphal, and even if duplication were infrequent, the conditions which give rise to it must be corrected. One suggestion is that there should be a master plan of employer contact within a given community, in order to prevent duplication in job development efforts.

Enrollees in OJT programs are drawn less frequently from the ranks of the disadvantaged. Efforts to redress this are underway, notably in MDTA's Ten Cities Coupled-OJT contracts, which are national contracts for the training of disadvantaged persons by private industry (in all but one instance). Nevertheless, much remains to be done in equalizing opportunity for the disadvantaged in OJT programs.

This problem is closely related to other shortcomings in OJT. Quality of the training, and adequacy of supportive services, are often questionable. Monitoring of OJT projects is usually so cursory that weaknesses are neither disclosed nor corrected. As for evaluation, less has been done in OJT than in any other program even though the major policy decision to expand OJT has already been made.

Employers too have grievances in connection with OJT application forms. The excessive paperwork and cumbersome routing of forms is particularly inappropriate in a program which seeks to encourage employer participation. Additionally, there appears to be an inverse relationship between the amount of paperwork and the extent of control in this program.

The recommendation that the Manpower Administrator give high priority to this situation acknowledges that he has both the will and the capacity to proceed at once with the painstaking inquiry and the hard decisions which are necessary. The administrative capability for remedying OJT problems has been enhanced by Secretary Wirtz's consolidation of job training programs within the Manpower

Administration, on December 19, 1967.^{3/} The administrative lines are now clear, but the substantive problems remain.

^{3/}The Secretary's "Memorandum: Manpower Administration" took OJT administration out of BAT and assigned it to BWP (renamed BWTP):

"...The Bureau of Apprenticeship Training will put its full effort on its traditional functions of promoting and developing private apprenticeship programs.

"...The Bureau of Work-Training Programs (present BWP) will continue to exercise its present functions; and will, in addition, have responsibility for the on-the-job training program under the MDTA and the Work Incentive program under the Social Security Act Amendments, so as to achieve an integrated work-training program. [BWP already has responsibility for work and training programs originating under EOA, which also have OJT facets.]

- (a) The staff functions of the BWTP will be combined with those of the other units of the Manpower Administration.
- (b) The functions of the BWTP will be carried out to the fullest practicable and effective extent through the system of State employment service offices.

"There will be common Regional Offices of the Manpower Administration, including the BES, the BWTP, and the BAT..."

18. LINKAGES BETWEEN MDTA AND OTHER WORK AND TRAINING PROGRAMS

MDTA training programs should be linked sequentially with other work and training programs which are geared to lower skill levels:

- An appropriate portion of MDTA slots should be reserved at the community level for enrollees cycled through from lower-skill work and training programs.*
- Invidious stipend distinctions should be eliminated for enrollees who graduate from other training programs to MDTA.*

A rational sequence of training programs was absent in every community the Greenleigh Associates study included, despite the many different kinds of programs which were present and could have been aligned for such a sequence. The creation of such a sequence hinges upon statutory changes for some details, but to a considerable extent is within the capability of the existing administrative structure. The existing nonsequential nature of training programs is wasteful and inefficient.

Neighborhood Youth Corps enrollees, for example, frequently "graduate" from NYC into nothingness. NYC is more often an income maintenance operation, at best requiring some simple useful work, and rarely a meaningful training program. (Hopefully this will change, if the 1967 EOA amendments are successfully implemented. These are discussed in the later recommendation here on Programs Originating Under the Economic Opportunity Act.) The result is that NYC graduates are rarely able to find permanent employment in adequate jobs. The youth who do not return to school need additional job training, but they are hardly ever cycled into higher-level training programs such as MDTA. The East Bay Skills Center in Oakland, for example, is one of the few MDTA programs which reserves slots for NYC graduates; but only 25 slots are reserved, in a community where there are almost 2,000 NYC slots.

Graduation from lower-skill training programs (not only NYC, but also Title V-WEP, Nelson, etc.) could be a significant step in advancing a person's employability, if the channels were opened for cycling immediately into a higher-skill training program. This requires the kind of slot reservation in MDTA recommended here, plus the channels of coordination and information recommended in earlier Greenleigh recommendations.

One roadblock in developing a rational cycling for graduates of lower-skill training programs is that they move into the higher-skill training program with invidious stipend distinctions. They are, in terms of stipends or salaries, "second-class" trainees. For example, a youth who graduates from a Nelson program to an MDTA program has to receive a lower stipend: the \$20 per week youth stipend in MDTA, which is lower than the \$1.50 per hour minimum applicable in the Nelson program. This kind of invidious stipend distinction was eliminated for NYC graduates; the 1966 MDTA amendments made the regular MDTA stipend applicable to NYC graduates, rather than the \$20 youth allowance. The same provision should be made applicable to graduates from other programs.

The impact of the invidious stipend distinction also falls upon welfare clients who may be enrolled in MDTA programs. The remedy for them would require the kind of "sliding scale incentive" basis which is proposed in the later recommendation here on Training Programs for Welfare Populations, i.e., welfare recipients should not be required to forfeit the full equivalent of stipends or salaries which equal their welfare payments.

19. THE QUALITY OF MDTA TRAINING

The quality of MDTA training should be improved, consistent with MDTA's goals and relation to lesser-skill training programs.

The range of MDTA training goes from rather high-level skills to very minimal entry-level duties:

Training has been conducted in all major occupational groups and in more than 1,300 different occupations. These occupations range from beautician and appliance repairman to draftsman and programmer for data processing. Additionally, refresher training was given in professional nursing and efforts are underway to expand it to other professions. Among institutional programs, the largest number of persons was authorized for training for auto mechanic/auto-body repairman, stenographer, general machine operator, welder, nurse aide/orderly, clerk typist, and licensed practical nurse. Among on-the-job training programs the largest number was for aircraft sub-assembler, nurse aide/orderly, welder, and general machine operator.^{1/}

In all the cities surveyed in the Greenleigh Associates study, insistent questions were raised about the quality of MDTA training, in OJT as well as in institutional programs. (The lack of meaningful training in OJT programs is noted also in the specific recommendation earlier on On-The-Job Training Programs. Enriching the quality of MDTA training is called for there, and would also result from the other recommendations in this report for more ABE, more supportive services, more evaluation, etc.)

^{1/}U.S. Department of Labor, Manpower Administration, The Manpower Development and Training Act: A Review of Training Activities (August 1967), p. 7.

Even among the most disadvantaged trainees, there was resentment about the low level of the jobs for which training is being given. Their complaints echo the despair of the Negro woman who declared, "We are being trained for the unemployed." 2/

Program administrators, as well as manpower specialists, are troubled by the fact that so much of the job training is for underpaid, undesirable, dead-end jobs:

At lunch today someone asked, "What sense does it make for OMAT to train people in the health professions so that they can earn the munificent sum of \$1 an hour after training?"

In the southern States people have already received more money while they were training than they earned when they were later employed. Many parts of the service sector are so badly structured from the point of view of efficiency and management, from the point of view of living wages, from the point of view of career lines, that it is almost a joke to talk about the unwillingness of people to take jobs or to work. It is not difficult to find people to work at any job if they are paid a decent wage and they see some chance of improving themselves. But what is the future for a dishwasher who is offered \$1 an hour?3/

2/"In its annual report last month, the United States Commission on Civil Rights commented acidly on the fruits of the Government's own efforts to equip Negroes for industrial employment. The commission described some training programs as unrealistic in terms of jobs actually available and of the qualifications of the hard-core unemployed. It quoted a New York Negro woman as declaring, 'We are being trained for the unemployed.' A Cleveland minister echoed her sentiment: 'The Negroes have got so they do not believe you when you say, "Training is the way to employment."'" The New York Times, December 10, 1967, p. 6E.

3/Eli Ginzberg, Expanding Employment in a Pluralistic Economy, Seminar on Manpower Policy and Program (U.S. Department of Labor, Manpower Administration, October 1966), pp. 14-15.

Even in MDTA programs where the courses appeared to be for jobs of higher quality than reported in national MDTA averages, the program administrators expressed misgivings. For example, the Director of the East Bay Skills Center thought that on the whole the training was not good enough to train real technicians, and really sufficed mostly for minimal entry-level jobs.

The fact that so many of the program and project administrators are aware of shortcomings in the quality of MDTA training does not assure speedy remedy. There is some striving for improvement, but it needs the capability recommended in many of the other recommendations here (Level of Funding, Grants for Planning, Evaluation, etc.).

Additionally, improvement in the quality of MDTA training requires some deliberate decision-making at the policy level. In the past, MDTA programs frequently offered high-level skill training and found trainees who could meet the somewhat stringent literacy and skill requirements by "creaming" the upper levels of the labor force. Presently, MDTA programs often stipulate unjustifiably long training periods for occupations with minimal skills, sometimes because supportive services are not available to facilitate a disadvantaged person's movement through the training.

There is an alternative to both of these undesirable stances. MDTA should be providing good-level training for jobs which have the promise of advancement and/or adequate compensation. Such training should have a battery of supportive and remedial services which enable disadvantaged persons to participate effectively.

MDTA training in this vein could and should serve as that part of the sequence of training programs which can receive graduates of lesser-skill programs (e.g., EOA and Title IV-SSA programs) and move them up to better job opportunities.

20. PROGRAMS AUTHORIZED UNDER THE ECONOMIC OPPORTUNITY ACT

Improved features which the Amendments of 1967 added to the EOA programs^{1/} should be extended to other job training programs:

- Provision for a comprehensive program at the community level, administered and funded through a single prime sponsor;
- Coordination and linkages among programs;
- Program enrichment to provide improved training and meaningful work experience;
- Systematic planning, data collection, and evaluation.

Congressional action on the Economic Opportunity Act in December 1967 has incorporated, to a large extent, changes that would otherwise have been urged here. In a sense the EOA changes represent the specific application to EOA programs of broad recommendations applicable to training programs generally, and set forth in earlier recommendations here (Grants for Planning, Program Reports, Evaluation, Linkages, Quality of Training, etc.).

The legislative changes were based on findings in studies (eponymously the Clark and Perkins Reports) conducted by the Senate and House Labor Committees during 1967. It is interesting to note the concurrence between the Congressional studies and the Greenleigh Associates study on the key administrative issue, i.e., to continue the delegation of programs by agreement, rather than by legislative re-assignment.^{2/}

^{1/}Excerpts from the Amendments appear in Appendix V.

^{2/}The Clark Committee recommended no change in the use of delegation powers contained in the Economic Opportunity Act. It noted that the Director of OEO had delegated six of the original ten programs to other Federal agencies,

The concurrence extends to two main themes. The first is the coordination of EOA programs in each community in a comprehensive work and training program channeled through a prime sponsor. The second is the enrichment of program content to provide a wide range of alternatives, an unbroken sequence of services, useful training and meaningful work experience.

There is also agreement on various specifics: legislative recognition of the Concentrated Employment Program, new program emphases in programs for the elderly, continuation of programs for migrant and seasonal farm workers, certain changes in Job Corps.

COORDINATION

The statutory sanction for coordination will now enable the local community to plan a comprehensive training program; it can fund it by funneling together flows from the various "spigots" through which Federal funds now trickle. Although the "funnel" relates only to EOA programs at this time, it constitutes a giant step forward toward a better manpower system for the totality of training programs.

The provision for a comprehensive program/prime sponsor design responds to the ineluctable finding--in the Clark and Perkins Reports, as well as in this one--that the fragmentation of training programs now results in waste and inefficiency.

had delegated three new manpower programs added in 1967 to the Department of Labor, and redelegated the Neighborhood Youth Corps.

"One of the reasons the committee is opposed to the statutory transfer of programs from OEO to other agencies is that the delegation route offers a much higher potential for establishing an effective system of coordination."
Economic Opportunity Amendments of 1967: Report of the Committee on Labor and Public Welfare, U. S. Senate, on S.2388 (U. S. Government Printing Office: Sept. 12, 1967), p. 7.

PROGRAM ENRICHMENT

The 1967 Amendments incorporate statutory requirements for quality training, useful work experience, and adequate remedial education, in programs with an unbroken sequence of services and a wide range of component offerings. These should correct many of the shortcomings in EOA programs which were noted in the Clark and Perkins Reports and corroborated in many respects in the Greenleigh study.

Neighborhood Youth Corps

NYC, as encountered during the field studies, had programmatic weaknesses which spilled over into administrative problems of waste and inefficiency. Although clearly a necessary and useful program, NYC in many of the cities surveyed could not provide meaningful work experience or training, and was not linked sequentially with other more substantial training programs. (The linkage problem is the subject of an earlier recommendation on Linkages Between MDTA and Other Work and Training Programs.)

In a few places NYC was genuinely a good training program, rather than a "make-work" operation or a holding operation. An outstanding example is the NYC program operated in Alameda County, California, by the AFL-CIO Central Trades and Labor Council. The program provides meaningful work experience, journeymen instruction, remedial education, and a bridge toward permanent employment and job advancement.

The 1967 Amendments offer out-of-school youth the full range of work and training opportunities offered to adults, setting aside age and program barriers between youth and adult programs.^{3/} This new basis will be more oriented

^{3/} Under the new Title II, EOA, the only programs exclusively for youth apply to students from low-income families who are in the ninth through twelfth grades of school (or are of an age equivalent to students in such grades) and who are in need of the earnings to permit them to resume or maintain attendance in school. Offerings for them are part-time employment, on-the-job training and useful work experience. (See Appendix V, p. A27.)

toward preparing youth (and adults also) for useful employment in terms of the regular labor market.

Operation Mainstream

This program (also known as Nelson or Community Employment and Betterment) tends to operate as a stopgap program, the Greenleigh study found. Admittedly the design of this program is to serve the most disadvantaged, primarily with work experience, and the type of work is geared to community betterment rather than job market requirements. However, under the prospective comprehensive program it should be possible to channel Nelson program completers--wherever appropriate--into more sophisticated training sequences, so that they may be more adequately prepared to obtain competitive employment.^{6/}

New Careers

The amended wording of the EOA section, on what has been known as New Careers or Scheuer, is a reaffirmation of the original purpose of the program. However, the amended wording explicitly emphasizes the development of new types of careers which have built-in opportunities for further training and education. (See Appendix V, p. A28.)

The unique value of this program lies in the mandate to develop career lines for which the disadvantaged can be trained. The Greenleigh study found that the original purpose of New Careers was not always implemented adequately. Hopefully the new legislative direction in the EOA Amendments of 1967 will bring a vigorous concern with

^{6/} This option, as the Clark Committee noted, is not realistic for all Nelson participants; "...while it is hoped that participants can be placed in competitive employment as soon as possible, they should not be pushed out if there are no jobs available." Report of the Committee on Labor and Public Welfare, op. cit., p. 29.

advancing trainees beyond entry levels and developing new approaches to effect continued advancement.

CONCENTRATED EMPLOYMENT PROGRAM

The Amendments provide legislative recognition for CEP. (See Appendix V, P. A28, paragraph (5).) The Greenleigh findings corroborate the value of the program design and goals, and the need for assuring a more secure flow of resources for CEP.

CEP was just getting under way in Oakland and St. Louis, at the time of the Greenleigh field studies. In St. Louis it was not being well received by overburdened manpower agencies, whose energies were drained by divisiveness between the older programs operating through State lines and the newer programs operating through local agencies.

Nevertheless the design of CEP is viewed by Greenleigh Associates as "potentially the best coordinated manpower effort developed so far"--to use the words of the Clark Committee.

THE ELDERLY

The 1967 Amendments direct special attention to the employment needs of the elderly.^{1/}

^{1/}Under Title I, OEO is directed to provide programs designed to deal with the incidence of long-term unemployment among persons 55 years and older, and include such persons as staff of component programs. (See Appendix V, p. A29, Sec.126.)

Under Title II, provision is made for a "Senior Opportunities and Services" program. Along with a range of other activities, this would include the development of new employment services as well as more effective referrals to existing services, for persons aged 60 and over. (See Appendix V, p. A31.)

The new emphasis on the elderly is also highlighted in the provision for Research and Pilot programs under Title II.

The findings of the Greenleigh field studies indicated that elderly persons were not being reached adequately within the existing resources and design of manpower programs. Capability for remedying this situation resides now in the statutory provision for new program emphases for elderly persons.

MIGRANT AND SEASONAL FARM WORKERS

The Amendments enable OEO to continue its efforts for migrant and seasonal farm workers. The need for such work was underscored by Greenleigh Associates observations in Fresno, Dallas, and Miami; pitifully little is being done for this group. They should also be brought into the orbit of all other training programs along the lines recommended earlier for Program Linkages and Cross-Funding.

The EOA program is a small one, but its capability for outreach and recruitment is an important resource. It is not duplicating other programs which in the main bypass migrants and seasonal farm workers.

JOB CORPS

The Amendments provide for a series of far-reaching changes in Job Corps, including systematic evaluation, better counseling and placement, cooperative activities with surrounding or nearby communities.

These should go a long way toward remedying deficiencies in the Job Corps. Systematic evaluation is an indispensable tool for identifying reliably the extent to which there may be waste in this major program. The Greenleigh study notes that Job Corps is a frankly experimental, inevitably expensive and intrinsically problem-ridden program. Definitive recommendations on Job Corps are clearly outside the scope of this study.

The new statutory requirements, for better counseling and placement for Job Corps enrollees, are consistent with earlier recommendations here on the general need for better counseling and placement. It is especially

pertinent in Job Corps, where there is considerable indication of inadequacy and inefficiency in this aspect of the program.

The new requirements to develop cooperative activities with surrounding or nearby communities^{8/} could lower the barriers which isolate the Job Corps from its neighbors. Not to utilize the resources of the community to enrich the Job Corps environment, is inefficient.

Not to make the resources of Job Corps' modern and expensive plant available to the surrounding community, to the extent possible, is wasteful. In California, for example, Camp Parks with its extensive and expensive facilities, had machine equipment and classrooms in use for only a few hours daily. A short bus ride away, in the Oakland area, disadvantaged persons went without training because facilities were not available. It is wasteful and inefficient not to close the gap between supply and demand. The Amendments of 1967 provide capability for doing that and more.

^{8/}Activities contemplated include (1) encouraging the fullest practicable participation of enrollees in programs for community improvement or betterment, with adequate advance consultation with business, labor, professions, and other interested community groups and organizations; (2) arranging recreational, athletic, or similar events in which enrollees and local residents may participate together; (3) developing, where feasible, job or career opportunities for enrollees in the community; and (4) promoting interchanges of information and techniques among, and cooperative projects involving, the center and community schools, educational institutions, and agencies serving young people. (See Economic Opportunity Amendments of 1967, Title I, Section 111, "Community Participation.")

21. TRAINING PROGRAMS FOR WELFARE POPULATIONS

Welfare recipients should be encouraged and assisted to participate in appropriate job training programs:

- They should receive the kind of intensive diagnosis, counseling, and follow-up appropriate to this group with its special problems.*
- They should have available the necessary supportive services, including child-care facilities to the full extent required.*
- They should be eligible for training program stipends or salaries on a sliding-scale incentive basis; they should not be required to forfeit the full stipends or salaries they earn in training programs when they simultaneously qualify for welfare assistance.*

A thorough examination of the welfare problem should be completed as rapidly as possible, including the place of welfare populations in job training programs, and should be utilized in developing a comprehensive and humane policy.

The tide of human misery reflected in the upsurge of welfare rolls cannot be stayed by Canute-like commands to "go to work." Not all the adult welfare recipients can be reclaimed or salvaged for the labor force.

But for those who could be salvaged for training and employment, the cost-benefit calculus would be very favorable, even in the most narrow fiscal terms. Dependency is so costly to society that even a substantial investment in human capital, among welfare recipients, can yield within a few years an excess of benefits over costs. The federally supported training programs for welfare recipients are animated by a desire to move them off the relief rolls. However, the resources allocated for such programs thus far have been too scanty. And the new revisions in Social

Security welfare provisions are in the main so ill-conceived that little progress is likely.^{1/}

In the summer and fall of 1967, when the Greenleigh field studies were made, there were two training programs for welfare recipients: the Title V-Work Experience Program, originating in the Economic Opportunity Act of 1964, and the Title IV-Community Work and Training Program, originating under the Social Security Amendments of 1962. Both were small programs with very limited resources.

The Title IV-Community Work and Training Program was operative in only twelve of the twenty-two eligible States. Eligibility was limited to States which per-

^{1/} During the first session of the 90th Congress, major revisions in the welfare provisions of the Social Security Act were being debated. The Administration had recommended amendments to provide a greatly expanded and liberalized Community Work and Training Program. On its way through Congress the bill underwent a series of transformations, seesawing from the Senate to the House, from the floor of Congress to Committees and Conference Committees. At one point the bill was so harshly punitive that it shocked the whole social welfare community and left many Senators aghast.

The cliff-hanger was resolved with a compromise bill which the President signed on January 2, 1968. His statement hailed the improvements in Social Security benefits, but recognized the deficiencies in the welfare provisions:

"...The welfare system today pleases no one... My recommendations to the Congress this year sought to make basic changes in the system.

"Some of these recommendations were adopted... Others of my recommendations were not adopted by the Congress. In their place, the Congress substituted certain severe restrictions.

"I am directing Secretary Gardner to work with state governments so that compassionate safeguards are established to protect deserving mothers and needy children.

"The welfare system in America is outmoded and in need of a major change.

"I am announcing today the appointment of a Commission on Income Maintenance Programs to look into all aspects of existing welfare and related programs and to make just and equitable recommendations for constructive improvements, wherever needed and indicated..." New York Times, January 3, 1968, p. 28.

mitted AFDC aid in families with an unemployed parent present; CWT was not available for States which restricted AFDC aid to needy families where the father was absent. There were only 15,300 Title IV-CWT program participants in May 1967, almost half of them in the State of West Virginia, and almost another quarter of the total were in the State of California. (See Table titled "Community Work and Training, Social Security Act-Section 409: Number of Program Participants and Amount of Federal Funds, by State, May 1967.")

The status of Title IV-CWT and Title V-WEP was very questionable during the course of our study, and indeed still remains somewhat questionable. Title V was a more generous program (i.e., available to all States without regard to AFDC-Unemployed Parent provisions; not restricted to welfare recipients; 100 percent federally funded in contrast to the 50 percent matching from States required by Title IV). But Title V was in the process of being phased out during the summer of 1967.^{2/}

Are there any judgments which can be drawn from ongoing Title V or Title IV projects which were observed during the course of the Greenleigh study? There was not much to be seen in the two cities in California and the two in Missouri, and the "rules of the game" were changing anyway. In Oakland, there were no Title V projects; the Alameda County Welfare Department had declined to participate in

^{2/}A major administrative change for Title V was inaugurated at the end of the summer. Labor, Welfare and Education were to be variously involved in administering the program; the intent was to bring the special talents of several agencies to bear upon the Title V program. The design of the new structure looked very intricate and cumbersome. (See the Table titled "Proposed Fund Flow Pattern, Title V Projects.") Perhaps in practice it could operate smoothly and improve the whole structure of Title V projects. It was not operational at the time of the Greenleigh field studies, but all the Title V personnel encountered by Greenleigh analysts at every level of government were filled with forebodings and skeptical that the new arrangements could be advantageous. The new arrangements have since been applied to a few Title V renewals; no new Title V projects were being funded in late 1967.

Title V because of its onerous and cumbersome machinery. There was a Title IV-CWT (SSA) program in Alameda County, which had had 929 persons in community work positions; of these, 423 had left welfare rolls completely, and another 205 had been placed in employment at wages too low to become entirely independent. In St. Louis there was a small Title V program, but no Title IV program.

In other areas there were "wide variations in the effectiveness of individual projects."^{3/} There have been some notable successes, including the outstanding Title V program in Ramsey County, Minnesota. These, as well as the difficulties encountered elsewhere, give support to the recommendation here that a new and thorough-going approach be made to the training needs of the welfare population.

The new Work Incentive Program, enacted by Congress in the 1967 amendments to the Social Security Act, is a long way from such an approach. Major provisions of the new amendments are:^{4/}

- A new work incentive program is established for families receiving AFDC payments, to be administered by the Department of Labor. The

^{3/} From "Report" in letter of June 6, 1967 to Senator Joseph Clark from William Gorham, Assistant Secretary for Program Coordination, HEW. The Report notes the special services required for the Title V target group. It points out that project effectiveness 'understandably' varies, "assuming that the target population is not to be 'creamed' and that high, as well as low, unemployment areas are to be served."

^{4/} The provisions are culled from Summary of Social Security Amendments of 1967, Joint Publication, Committee on Finance of the U. S. Senate and Committee on Ways and Means of the U. S. House of Representatives (Washington: U. S. Government Printing Office, December 1967). Supplementary sources are identified, where cited.

State welfare agencies will determine who is appropriate for referral.^{5/}

.For all those referred, the welfare agency will assure necessary child care arrangements for the children involved.^{6/}

.People referred by the State welfare agency to the Department of Labor will be handled under three types of programs: (1) regular employment or on-the-job training; (2) institutional and work experience training; or (3) special work projects for individuals for whom a job in the regular economy cannot be found.^{7/}

.Participants in training (2, *supra.*), may receive an incentive payment of not more than \$30 per month, "payable in such amounts and at such times as the Secretary prescribes."^{8/}

.Participants in special work projects (3, *supra.*) will be employed by public agencies or non-

^{5/}Excluded are (1) children under age 16 or going to school; (2) any person with illness, incapacity, advanced age or remoteness from a project that precludes effective participation in work or training; (3) persons whose substantially continuous presence in the home is required because of the illness or incapacity of another member of the household.

^{6/}The Social Security Amendments of 1967 (P.L.90-248, January 2, 1968) authorize to be appropriated \$55M for FY 1968, \$100M for FY 1969, and \$110M for each fiscal year thereafter to cooperate with State public welfare agencies in establishing, extending, and strengthening child-welfare services. (Title IV, Part B, Appropriation.)

^{7/}Social Security Amendments of 1967, Title IV, Part C, Sec. 432.

^{8/}Ibid., Sec. 434.

profit private agencies organized for a public service purpose, at wage rates no lower than the applicable minimum wage. The special work projects will be financed from payments made by the State welfare agency equal to (1) the welfare benefit the family would have been entitled to, or, if smaller, (2) 80 percent of the rates the individual receives on the special project.

.In most instances the participants in special work projects will not receive a check from the welfare agency, but instead will receive payment from the employer for services performed. The payment will be subject to income, social security, and unemployment compensation taxes.^{9/}

.A refusal to accept work or undertake training without good cause by a person who has been referred, will be reported back to the State agency by the Labor Department. Unless such person returns to the program within 60 days, his welfare payment will be terminated.^{10/}

.The States will have to meet 20 percent, in cash or in kind, of the total cost of the program (excluding non-administrative costs for special work projects, which

^{9/}"In those cases where an employee receives wages which are insufficient to raise his income to a level equal to the grant he would have received had he not been in the project plus 20 percent of his wages, a welfare check equal to the difference would be paid. In these instances the supplemental check would be issued by the welfare agency and sent to the worker." Summary of Social Security Amendments, op. cit., p. 17.

^{10/}"Protective and vendor payments would be continued, however, for the dependent children to protect them from the faults of others." Ibid., p. 17.

come from the employer and the transferred welfare payments).

- The AFDC-UP requirement is no longer applicable in the same manner it had been for CWT. New language and provisions in the 1967 amendments seem to restrict the States in defining eligibility, in contrast to the former requirement that States should not exclude aid where the father was absent.
- The following limitation on Federal matching in AFDC programs will be effective after June 30, 1968: Federal financial participation will not be available for any excess above the percentage of children of absent parents who received aid to the child population under age 18 in the State as of January 1, 1968.^{11/}

A point-by-point evaluation of this elaborate, involved,

^{11/}"The sole purpose of the 'freeze' on the number of beneficiaries, Mr. Mills [chairman of the House Ways and Means Committee] argued, was to 'put pressure on the states' to make them carry out the work and training programs and thus get some persons off the rolls.

"The opponents were almost entirely to be found among the liberal Democrats, most of those in the House representing big-city districts. To them, the changes ranged from cruel to costly. Although Mr. Mills insisted that no child would be denied welfare, the liberals argued either that they would, or that the states and cities would have to pick up the whole tab...

"The freeze has been estimated by Mayor Lindsay of New York to cost the city about \$30-million over the next 18 months. The alternative would be to deny benefits to an estimated 126,000 children, based on the recent experience of growth on the rolls..." New York Times, December 17, 1967, p. 2E.

untested, and already-challenged legislation^{12/} will undoubtedly be on the agenda of the new Commission on Income Maintenance Programs; it is not feasible here. The recommendations offered by Greenleigh Associates are the outgrowth of the study of training programs commissioned for the Committee on Administration of Training Programs, including the Title V-EOA and the former Title IV-SSA programs for welfare recipients.

The recommended changes were not incorporated in the new 1967 amendments to the Social Security Act, to the extent required to 'open the doors' of job training opportunities to welfare recipients, without restrictive and degrading distinctions.

The first item in the Greenleigh recommendation--for intensive diagnosis, counseling, and follow-up--seeks to provide for the welfare population the same kind of comprehensive service that the Vocational Rehabilitation Administration extends to the physically and mentally handicapped. The welfare population is as cruelly handicapped, and just as urgently in need of rehabilitation.

The next item in the recommendation calls for supportive services. These were recommended in training programs generally in earlier recommendations here, but they are especially essential for welfare recipients; testimony on this score from Ramsey County is impressive.^{13/} The need is even greater if mothers of young children are to be included.

^{12/}"The welfare changes effected by the bill prompted 11 Democrats and three Republicans in the Senate to vote against the final measure as Congress closed on Dec. 15, including Senators Robert F. Kennedy and Jacob K. Javits, Democrat and Republican of New York. They vowed a fight to lift the restrictions this year." New York Times, January 3, 1968, p.28.

^{13/}Don Henry, Project Director, Ramsey County Welfare Department, St. Paul, Minnesota, Two Years of Work and Training in Title V: A Technical Report of Relationships Between Client Characteristics and Project Participation to Employment (August, 1967), p. 28:

"There appears to be a tendency to regard the Work and Training Project as basically a training project in the same manner as MDTA; however, this Project is most basically a family

The third item in the recommendation calls for a sliding-scale incentive basis for welfare recipients enrolled in training programs. They should be permitted to retain a significant portion of the regular training program stipend or salary; they should not be required to forfeit in full whatever is earned in training programs because they are receiving welfare assistance. This recommendation seeks to remove the "second-class" status which attaches to welfare recipients in trainee programs. (The general problem of invidious distinctions in stipends for trainees is discussed in the earlier recommendation here on Linkages Between MDTA and Other Work and Training Programs.)

Humanitarian though the recommendation may be, its genesis is economic. The present forfeiture of stipends or salaries by welfare recipients creates a strong "disincentive" to participate in training or employment.^{14/} The incentive

rehabilitation program with an emphatic employment orientation. Specific skill training may or may not be a component of sound employment planning. The significance of training ranges from virtually essential in some cases to completely inappropriate in others...

"There are instances in which specific skill training is quite far removed from the immediately practical employment question, and the employment goal is achieved by combining family casework and vocational direction through counseling, while calling upon basic nontraining resources such as work experience, adult education, and group work services. Conversely, there are a great many cases in which a lack of the opportunity would seriously limit employment planning."

^{14/}Eli Ginzberg makes the point pithily: "If a man can earn almost as much by doing nothing, and especially if he cheats on the margins a little bit, why should he take a job?"

Professor Ginzberg went on to say: "I have tried to call the Congress' attention to the importance of correlating relief structures with a lot of its manpower policies. But even Senator Clark has been very loath to get pushed in that direction. I think he figures he has enough troubles without taking that one on. But it is not sensible for the long pull to think you can devise manpower policy without reference either to wages or relief." Expanding Employment in a Pluralistic Economy, op. cit., pp. 28-29.

payments of up to \$30 monthly provided in the newly-established Work Incentive Program (Title IV-SSA) do not appear to be sufficiently extensive or flexible. A more generous and flexible incentive is being tested in New York City by the Human Resources Administration, Social Services Department; since September 1, 1967, welfare recipients who get jobs keep the first \$85 they earn each month, and their welfare grants are reduced by 70 percent of earnings beyond this \$85; in the past all their earnings were forfeited.

Overall, the Greenleigh study makes clear that the vocabulary of "waste, duplication, and inefficiency" is inappropriate and unseemly with respect to training programs for welfare populations. The failure to provide suitable employment opportunities for the welfare population, or to make available sufficient resources for their training, can more aptly be pronounced a national disgrace and a national disaster.

Much more than job training is of concern in the public welfare system, where President Johnson is seeking "just and equitable recommendations" from the Committee on Income Maintenance Programs.^{15/} But the investigations for the Committee on Administration of Training Programs have already established that job training programs for welfare recipients should provide opportunities, not penalties.

^{15/} In announcing the appointment of the Commission, chaired by Ben W. Heineman, chairman of the board of Chicago and Northwestern Railroads, President Johnson called for the examination of "any and every plan, however unconventional, which could promise a constructive advance in meeting the income needs of all the American people." New York Times, January 3, 1968, p. 28.

22. ADULT BASIC EDUCATION

Federally supported adult basic education programs should be closely linked with MDTA and other work training programs. A minimum of fifty percent of funds for adult basic education, under Title III of the Elementary and Secondary Education Act, should be reserved for use in training projects which couple basic education with job training or work experience.

One of the most compelling problems to emerge in the Greenleigh study is the need for basic education among actual and potential enrollees in job training programs. The failure to meet this need--by failing to combine resources from Title III of E&SEA with resources from the various job training programs--constitutes both waste and inefficiency.

Remedial education is invariably required for the disadvantaged, to: (1) qualify them for admission into training programs, (2) equip them to comprehend and complete the training sequence, and (3) enable them to benefit fully from the training offered. Program administrators recognize that completion of a work experience program or job training course can not greatly enhance an enrollee's employability, if his educational deficiencies are not remedied at the same time. Job placement, especially in permanent or adequate employment, is very difficult for trainees who lack basic education skills.

In every city surveyed there was testimony to this effect by program administrators and trainees. Scores of examples could be cited, along the lines of the following:

- A work site supervisor in an Operation Mainstream program in Fresno declared that a certain percentage of the enrollees could be hired permanently if they passed the civil service examination, but first they needed much more basic education than the program was providing.
- The director of a sizable OJT project in Oakland, which was attempting to serve the hard core, noted

that training schedules had to be modified so that enrollees could be brought up to the minimum level in arithmetic and English.

- Spanish-American enrollees at the East Bay Skills Center in Oakland complained about a reduction in literacy training, asking, "What good is a trade if you can't speak English?"
- Another group of enrollees at the Skills Center agreed with one who said, "Most bosses say you must have a high school diploma before they hire you. I know lots of people here over 40 who never went to school, trying to learn new jobs. What good is it if he gets the training and can't get the job?"

At the same time, and in the same cities, many sponsors of basic education programs were expressing concern with the peripheral nature of their programs, and the apparent lack of connection between the education offered in their classrooms and the enrollees' workaday lives.

The very same groups and individuals in the inner-city areas, who were most insistent on the need for basic education offerings, were equally emphatic in explaining why disadvantaged persons turned their backs on conventional classroom programs. They mentioned such reasons as:

- The school locations were inconvenient, or were considered uncongenial for adults.
- The curriculum was too remote from their needs or experiences.
- The teachers did not work sympathetically with disadvantaged adults, or skillfully with non-English-speaking persons.
- Poor people do not have child-care facilities to free them for school attendance, and/or can not afford to participate in nonstipended classes.

In most of the cities surveyed, coordination was almost nonexistent between manpower programs and ABE programs funded under Title III, E&SEA. The latter were under the

auspices of the public school system, except in St. Louis; because the State of Missouri would not meet Title III's 10 percent matching requirements, adult basic education programs in St. Louis were provided by the University of Missouri, under contract with the Human Resources Development Corporation (the local CAP agency in St. Louis).

Administrators of manpower programs generally seemed unaware of the existence of Title III ABE programs operated in the local school system. In any event the two kinds of programs operated on entirely separate tracks. Job training programs either included adult basic education components, or sought additional funds for such a component, meanwhile frequently refusing admission to the most disadvantaged persons. *(The earlier recommendation here on the Level of Funding points out that there are not enough funds available for the remedial education needs in training programs. The recommendation urges expanded resources for training programs, including resources for adult basic education and remedial education.)*

The situation is especially poignant for welfare populations. The absence of closer relations in Title III-ABE and Title V-WEP programs has created problems for both.^{1/} In Nassau County in the State of New York, adult education directors in the public school system alleged that divergence between the two programs resulted in the atrophy of Title III-ABE. The basic difficulty for Title III there, as in many other places, was recruitment. Title III classes had been funded and staffed, with the expectation that the

^{1/} Examples cited are from the study in progress which Greenleigh Associates is conducting in a varied series of locations in New York, New Jersey, and California: Syracuse and Utica upstate, and Nassau County downstate, in New York, including the towns of Hempstead, Freeport, Glen Cove, Long Beach, and Westbury; Camden, Paterson and Passaic in New Jersey; and in Contra Costa County in California, the unified school districts of Richmond, Pittsburg, Mount Diablo and Antioch, and the Liberty Union high school district. The study is a follow-up for the Office of Economic Opportunity, of the Field Test and Evaluation of Selected Adult Basic Education Systems in the earlier contract during 1965-1966. This cooperative research project involved the Office of Economic Opportunity, the Welfare Administration, and the Office of Education.

welfare agency would recruit students; when this failed to materialize, many classes were dissolved for lack of students. In New Jersey, more than one urban adult education director in the school system was not receptive to conducting adult basic education classes. All impetus and planning had to come from Title V-WEP personnel, with even greater than usual obstacles to overcome. In some counties, lack of coordinated funding of Title III-E&SEA and Title V-WEP caused many delays and false starts in the basic education programs for welfare recipients. Title III-ABE was found to be divorced from Title V-WEP in structuring courses which would be pertinent to the needs of the poverty population.

Since Title III-E&SEA is supposed to be directed to persons with severe educational handicaps, much of its target population overlaps with that of the training programs (Title V-WEP, MDTA, etc.). As each type of program is insufficient to serve this population without the services of the other, definite linkage is clearly desirable.

What is needed and what is recommended is a direct linkage of resources from both Title III and the training programs. This would take the form of earmarking a substantial portion of Title III funds for use in training programs, in order to effectively couple adult basic education with skill training and work experience.

The expertise of the Office of Education, as well as its financial resources, would be utilized in the coupled programs just as it is in MDTA coupled programs now. In fact, the Office of Education's role would probably be enhanced, commensurate with the enlargement of its financial support for training programs.

The recommended coupling would strengthen training programs by easing the problems of recruiting the disadvantaged, servicing them without a high dropout rate, and improving their placement potential. Similarly Title III programs would overcome the disadvantage they have suffered in trying to involve the poor in an unstipended program which seems to have no visible connection with employment or income advancement.

Efficiency does not require that all Title III funds be coupled with funds for training programs. In some cases basic education alone suffices to qualify an individual for

suitable employment; the best example of this may be the Title III programs for Cuban refugees. In other cases the end goal of basic education may not be regular employment. But in a substantial number of cases the target populations for adult basic education and job training do coincide. It is wasteful and inefficient to offer disadvantaged persons literacy training without job training, or job skills without literacy skills.

23. VOCATIONAL REHABILITATION

A portion of the funds for vocational rehabilitation should be earmarked for use by the Vocational Rehabilitation agency in conjunction with comprehensive work and training programs.

Vocational rehabilitation is a special kind of program in at least two respects. First, it is essentially directed to the physically and mentally handicapped, although it shares the concern which all the training programs have for the economically and socially disadvantaged. In fact, many of VRA's physically and mentally handicapped clients are also economically and socially disadvantaged. Vocational rehabilitation was undoubtedly assisting the "disadvantaged" long before its administrative regulations were changed in 1965 to extend eligibility to the culturally handicapped (i.e., persons whose deviant social behavior results from vocational, educational, cultural, social, environmental or other factors).

Second, vocational rehabilitation is itself a comprehensive program:

This is a program which is not wedded to any method, or any area, or even any particular set of services. A counsellor takes a man as he finds him, attempts to remedy his defects, and then to give him the type of training or other services which will best equip him to make his way in the labor market. The counsellor is free to purchase a wide range of services from the community and to utilize existing facilities to place the individual in a job. In concept, if not always in practice, the counsellor designs the program for the man. The man is not required to discuss whether he fits into the rubric of any particular retraining, counselling or physical

restoration program.^{1/}

The Greenleigh field studies found that the vocational rehabilitation programs were able to serve only a very small portion of the population which could benefit from VRA attention. For example, the Division of Vocational Rehabilitation in Oakland reported that it had funds to serve 440 persons in fiscal 1968, but estimated that there were about 7,700 who needed vocational rehabilitation.

The Greenleigh study observed that VRA tended to keep its operations separate and apart from the job training programs in local communities, for several reasons. VRA's limited financial resources and the self-contained nature of its program have already been mentioned. Additionally, VRA has a long-established administrative structure within the State governmental apparatus. Its contacts with other programs are infrequent, particularly those based outside State administrative lines.

Some of this isolation is breaking down because of VRA's participation in CAMPS, but relationships there tend to be largely informational rather than coordinative.

Probably the most inhibiting factor is that VRA administrators are not usually oriented to working with disadvantaged persons, despite the administrative enlargement of VRA's jurisdiction to the culturally handicapped.

One striking exception encountered in the Greenleigh Associates study was in St. Louis, where VRA has undertaken some special projects to bring the agency into contact with the disadvantaged. There is a general outreach program in which ten vocational rehabilitation counselors are outstationed half-time in CAP neighborhood

^{1/} Monroe Berkowitz, Director, Bureau of Economic Research, Rutgers, "The Changed Outlook," in Labor Rehabilitation Report, National Institutes on Rehabilitation and Health Services (Washington, D. C.: Vol. V, No. 10, October 1967), p. 5.

centers; potential clients are referred to VRA's central diagnostic center.

Also in St. Louis, VRA funds an R&D (research and demonstration) program for outreach and recruitment in Pruitt-Igoe, a ghetto housing project inhabited entirely by welfare clients. Though small in scope, this R&D program appears to be doing a very effective job of counseling and referral. The VRA Director participated in organization of the Pruitt-Igoe Council, composed of representatives of all organizations in the area, which meets regularly to discuss neighborhood needs. The Council serves also to disseminate information about vocational rehabilitation services, and channels referrals to VRA.

The community--particularly its poverty population and the job training infrastructure--benefits from this kind of contact with VRA. So does VRA, in the sense that it reaches more directly into the disadvantaged population it hopes to serve.

The recommendation here, for earmarking a small portion of VRA funds for VRA use in conjunction with comprehensive work and training programs,^{2/} looks toward infusing the job training complex with more of the "client-oriented" approach which is VRA's hallmark. It seems wasteful and inefficient, in a milieu of multifarious programs, to fail to bring the best features of each to bear upon their common goals. Vocational Rehabilitation has many features which can be commended to the newer programs. Indeed, many manpower specialists regard vocational rehabilitation as a desirable prototype for manpower programs generally:

Only one Federal program approaches in concept the ideal of an integrated manpower program:

^{2/}The "comprehensive" programs could be: (1) programs planned in a CAMPS area; (2) programs arising from other recommendations here, such as the recommendation for planning grants, or for EOA programs; and (3) an outgrowth of cross-funding, as in the earlier recommendation here on cross-funding.

The Vocational Rehabilitation Program. Like anything else in the real world, it falls far short in practice of what it is designed to accomplish in concept. Nevertheless, it is worth examining as a model of a single program designed to provide the full range of services required by those facing handicaps in labor market competition.^{3/}

^{3/}Thayne Robson and Garth L. Mangum, "Coordination Among Federal Manpower Programs," Critical Issues in Employment Policy, eds. Frederick H. Harbison and Joseph D. Mooney (Princeton: Princeton University, 1966), p. 127.

24. VOCATIONAL EDUCATION

Two new linkages are recommended between the vocational education system and the local job training complex:

- A substantial amount of funds authorized under the Vocational Education Act of 1963 should be earmarked for "Special Needs" and used by the vocational education system in conjunction with comprehensive work and training programs.
- The vocational education in-school programs should be offered to youth outside the school system, via an outreach program, and in the form of cooperative education (i.e., institutional training plus part-time training-related employment).

Vocational education is a system, rather than a program. It is, in contrast to MDTA and other job-training programs, a long-established fully structured portion of State educational systems, federally supported to a considerable extent.

In other respects too, vocational education differs from most of the job training programs within the purview of the Committee on Administration of Training Programs. First, vocational education is largely an in-school program for youth. Second, its out-of-school programs also are oriented mainly toward the general population rather than toward a specific target group, such as the disadvantaged.

The Greenleigh Associates study looked at vocational education programs only in relationship to the national job training effort for out-of-school persons. (Vocational education for in-school students was outside the scope of this study. Vocational education involvement in other programs is discussed elsewhere; for example, the role of the vocational education system in planning and implementing the institutional aspects of MDTA is described in Chapter IV.)

Two major findings emerged from the examination, along these lines, of vocational education programs:

- There is no mandate for vocational education to emphasize or meet the needs of the disadvantaged. Nevertheless there is a special needs program intended for--or with the potential to serve--this purpose but not fulfilling it at all adequately.
- The linkages between the vocational education system and the local job training programs are at best inadequate, and more frequently non-existent.

The recommendations here are addressed to overcoming these inadequacies, which are relevant to the Committee's inquiry, without altering the larger facets of the vocational education system which are outside the scope of this particular study.

The first recommendation refers to the Vocational Education Act of 1963, because two of the six types of programs Congress authorized therein have potential relevance for the unemployed and disadvantaged:

Vocational education for persons...[other than those receiving training allowances under MDTA, Area Redevelopment Act, or Trade Expansion Act] who have already entered the labor market and who need training or retraining to achieve stability or advancement in employment;

Vocational education for persons who have academic, socio-economic, or other handicaps that prevent them from succeeding in the regular vocational education program.^{1/} (The latter

^{1/} Vocational Education Act of 1963, Sec.4(a)(3) and (4). The other four purposes for which Federal funds may be used are for (1) vocational education for persons attending high school; (2) vocational education for persons who completed or left high school and are available for full-time study for labor market entry-preparation; (3) construction of school facilities; and (4) ancillary services, such as teacher training, administration, etc.

program, for persons with some handicaps, is referred to as "Special Needs" by BALVP, the Federal education agency, i.e., Bureau of Adult, Vocational, and Library Programs, in the Office of Education, HEW.)

These two programs have been funded at a very low level, and in any case have not served disadvantaged out-of-school persons. In the most recent year for which such data are available--fiscal 1966--1.1 percent of resources under VEA were allocated for persons with special needs, 4.5 percent for adults. Projections for fiscal 1967 were, respectively, 3.3 percent and 6.1 percent.^{2/} Only a very small portion of even these meagre efforts went to the hard-core population.

The offerings of adult vocational education presently are not appropriate to the training needs of the disadvantaged. Approximately one-third of the enrolled adults are in home economics, agriculture, and other courses not specifically occupation-oriented.^{3/}

In the cities surveyed by Greenleigh Associates, much of the adult occupational training in vocational schools was for women going into secretarial work (an occupation recently brought within the scope of vocational education), or for technical refresher courses. In most of the cities, fees and/or tuition were charged for adult vocational courses, making enrollment difficult or impossible for the poor. The CAMPS report for Oakland noted that the City's vocational education slots would serve few, if any, in the hard-core slum areas.

The special needs facet of vocational education is primarily directed toward secondary school students with

^{2/}See Table titled "Vocational Education: National Trends 1965-1967 in Expenditure Percentages for Vocational and Technical Education by Purpose, Vocational Education Act of 1963."

^{3/}Figures from Division of Vocational and Technical Education, BAVLP, OE, "Program Planning-Development-Budgeting Series-No. 1," (March 15, 1967), p. 2.

behavioral and learning problems. BAVLP makes this orientation clear; its national projections indicate that secondary (i.e., high school) and post-secondary (i.e., high school graduates) are expected to account for 60 to 75 percent of enrollees in special needs programs over the next few years.^{4/}

In Oakland, all special needs programs were directed toward mentally or educationally retarded high school youths.^{5/} In Missouri there were few such programs; they included only one specifically for adults, and one other for unwed mothers.

Orientation of vocational education to the special needs of the disadvantaged is the objective of the first linkage recommended here, i.e., earmarking a substantial amount of VEA funds for "Special Needs" and for use by the vocational education system in conjunction with comprehensive work and training programs.

^{4/} Ibid., facing p. 12.

^{5/} Special needs programs in the State of California are described as inadequate in Vocational Education in California, 1964-65, Annual Descriptive Report for the Fiscal Year Ended June 30, 1965, California State Department of Education, Max Rafferty - Superintendent of Public Instruction, Sacramento (1966), p. 9:

"The most favorable description of vocational education's contribution to the occupational preparation of persons who have 'special needs' would still reveal a serious deficiency. To date, even with an augmentation of funds, only feeble and tentative efforts have been made to devise, develop, inaugurate, and operate occupational preparation programs geared to the specialized needs of both youth and adults who suffer handicaps that preclude entry into, or success in traditional patterns of, and approaches to, vocational education."

The suggested earmarking is consistent with similar earmarking for other purposes in VEA.^{6/} It is urged for programs for out-of-school disadvantaged persons. The programs should be occupationally oriented and part of a coordinated effort to prepare the disadvantaged for useful employment.

The proposal that such VEA funds be used in conjunction with the community's comprehensive work and training programs,^{7/} looks toward:

- Opening up the facilities and resources of the vocational education system to the participants in comprehensive work and training programs;
- Reciprocally, supplementing the vocational education offerings with the remedial education, on-the-job training, and other facets of comprehensive work and training programs.

^{6/}The Vocational Education Act of 1963 (P.L.88-210) provides in Section 4(b) that at least one-third of each State's allotment (for any fiscal year ending June 30, 1968; and at least one-fourth for any subsequent fiscal year) is to be used for either or both of the following purposes:

"...Vocational education for persons who have completed or left high school and who are available for full-time study in preparation for entering the labor market;

"...Construction of area vocational education school facilities;"

The same section further provides that "at least 3 per centum of each State's allotment" shall be used only for "ancillary services and activities to assure quality in all vocational education programs, such as teacher training and supervision, program evaluation..."

^{7/}The "comprehensive" programs could be: (1) programs planned in a CAMPS area; (2) programs arising for other recommendations here, such as the recommendation for Planning Grants, or the one for EOA programs; (3) an out-growth of cross-funding, as in the earlier recommendation here on Cross-Funding.

As for the second linkage recommended here (i.e., co-operative education), it is specifically addressed to the need to "re-claim" youth who have left school. Whatever the reasons for their alienation from institutionalized education, it is wasteful to ignore the possibility that existing vocational education resources may be utilized in an innovative manner to provide useful occupation training for these youth.

Outreach is urged because of corroboration from the Greenleigh Associates field surveys that effective outreach is an essential component of any program aimed at the disadvantaged.

The suggestion that the "mix" offered to youth should include part-time training-related employment is based on several observations in the Greenleigh study:

- The positive effect on employability of on-the-job training and/or relevant work experience;
- The value of meaningful work experience to youth who have never participated in competitive employment;
- Most of all, the economic needs of poor youth for a source of income to encourage and enable them to maintain enrollment in education or training programs.^{8/}

^{8/} It should be noted that the Vocational Education Act of 1963 included an income-assistance feature, i.e., "Work-Study Programs for Vocational Education Students, Section 13." This program subsidized the part-time employment of vocational education students in school systems or other public agencies, and was administered through the regular vocational education channels.

There were no funds requested for this program in the President's Budget for fiscal 1968. The assumption was that the program's functions would be performed by the Neighborhood Youth Corps, through its work experience programs for high school students. Accordingly, there were no Work Study (VEA) programs operative during the summer and fall of 1967 when the Greenleigh field sur-

veys were in process and no observations could be made of the program.

The House Committee on Appropriations had decided on May 22, 1967, that "Work-Study" should be retained as a separate program and remain under the administration of the Office of Education. The Committee recommended, in its report on HEW and Labor appropriations, that \$10 million be transferred from OEO appropriations for this purpose. The Senate Committee on Appropriations concurred in this recommendation on August 1, 1967.

After Office of Economic Opportunity funds were appropriated on December 15, 1967, it developed that there were \$10 million provided in the Neighborhood Youth Corps allocation specifically for transfer to HEW for the conduct of the "Work-Study" program. At the time of this writing it is not clear when the transfer of funds is to be implemented or what effect it will have in establishing local Work-Study projects during fiscal 1968.

25. APPRENTICESHIP

The Manpower Administration should continue to encourage and expand the type of assistance to apprenticeship applicants which is provided by the Workers Defense League program for training young persons to qualify for appointment as apprentices.

Apprenticeship programs are not federally supported training programs in the same sense that MDTA, for one example, is. The Federal role in apprenticeship programs is a very limited one, as was pointed out in the Greenleigh Associates First Preliminary Report to the Committee on Administration of Training Programs:

...the Federal role in these programs does not relate to the skill training, but only to encouraging industrial management and unions in the development of programs. The \$6.5 million Federal allocation for the National Apprenticeship Program is only for salaries and related costs of field personnel of the Labor Department's Bureau of Apprenticeship Training.

Accordingly, the Greenleigh field studies did not go into apprenticeship programs as such. However we frequently encountered, among the disadvantaged and particularly among minority groups, deep aspirations to apprenticeship and bitter resentment that entry into the skilled trades was so difficult.

We were favorably impressed, as apparently the Committee also was, with the account of the Workers Defense League apprenticeship entry program which was presented at the Committee's September 25th meeting. The program is a small but significant one. The tutoring it provides for young Negroes and Puerto Ricans, who want to work in apprenticed crafts, has been emi-

nently successful.^{1/}

1/The New York Times of December 30, 1967, reported (p. 20):

**"TRADE PLAN AIDS MINORITY GROUPS
30% Sheetmetal Positions Won by Those in Program**

"Of 380 youngsters who competed for 60 apprentice appointments [in Local 28 of the Sheetmetal Workers International Association], 45 were from minority groups. Of the 45, some 32 were tutored under the joint program of the Workers Defense League-A. Philip Randolph Educational Fund, and 18 of these placed in the top 60.

"...Ernest Green, director of the tutoring program, said he felt the results vindicated the 24 Negro applicants who, after tutoring, passed the sheetmetal apprenticeship test in 1966, half of them in the top 15... A New York University professor called the results 'utterly fantastic.'

"The Joint Apprenticeship Committee of the employers in the industry and the local disputed the results, and the State Commission for Human Rights took the case to the courts. Supreme Court Justice William C. Hecht Jr. ruled last Feb. 10 that there was no evidence of impropriety and ordered that the 24 be given job assignments...

"Dennis Derryck, the assistant director, said, 'The results are easy to understand... These kids are at the top of the heap and they're highly motivated...' ...

"William M. Ross, a New York field representative, said the program had obtained 30 per cent of the placements in every test situation in three years of operation--and better in selections by interview and examination of records.

"...Mr. Green said that this year 25 young men were tutored for building trade apprenticeships and 175 were placed.

"'Of the 18 major crafts in the building trades,' he said, 'we've placed youngsters in apprenticeships in all but three--the operating engineers and two small trades, the marble setters and the terrazo workers.'

"...Peter J. Brennan, president of the New York Building Trades Council, has given the tutoring project strong support. According to Mr. Green, most union leaders in the building trades, including Mr. Farrell [president of Local 28, Sheetmetal Workers], are cooperating, and a few have sought the project's help in changing their selection systems from nepotism to full competition."

The WDL program has had some very modest funding support under MDTA, and would seem to merit more.^{2/}

As for the broad subject of apprenticeship, obstacles to entry for the disadvantaged are described and recommendations to overcome the obstacles are set forth in the excellent recent study by one member of the Committee on Administration of Training Programs and its Research Director.^{3/} Professors F. Ray Marshall and Vernon M.

^{2/} Ibid., "Initially financed by the Taconic Foundation and then the Randolph Fund, the program is funded by the United States Labor Department and the Ford Foundation and is spreading to Newark, Buffalo, Cleveland and other cities. Its goal is to double placements in 1968, Mr. Green said."

^{3/} Commendations of the WDL program also appear in the study, published as The Negro and Apprenticeship (Baltimore: The Johns Hopkins Press, 1967):

"Although our evidence is far from conclusive, we are persuaded that fairly administered tests are not insurmountable obstacles to the entry of Negroes into apprenticeship programs. The experience of the Workers Defense League in New York suggests that, with proper selection and tutoring, Negroes can perform at least as well as whites on apprenticeship selection tests...(p. 45)

"In addition to locating minority applicants, an important explanation for the success of the WDL's work has been its ability to win the confidence of many union officials in the community...(p. 73)

"...The Workers Defense League has no legal status. Its role has been to accomplish the task of promoting apprenticeship in general, of dispensing detailed information about specific programs, of recruiting individuals interested in applying, of tutoring applicants to pass the written examination, and of conducting follow-up research studies of the experiences of the successful white and nonwhite entrants into the programs in order to improve their procedures for the future. We are persuaded that such comprehensive efforts are required to make meaningful progress in the construction trades.(p. 80)

"...The experiences of the WDL in New York, the TULC in Detroit, and the concerted activities of various groups in Chicago demonstrate that, although recruiting qualified applicants for apprenticeship openings requires considerable effort, a flow of applicants can be found in the Negro community if some organization devotes itself full time to this problem. Moreover, the WDL's experience also shows that many unions actually are relieved to find a responsible civil rights organization which can supply qualified members of minorities." (p. 244)

Briggs, Jr., are the authors of The Negro and Apprenticeship, published in November 1967. Their book is based on a report prepared under a contract with OMPER, under the authority of Title I of MDTA. Secretary Wirtz has stated:

This careful, fair-minded study outlines a course of action to bring more qualified Negroes into apprenticeship. The Department of Labor has acted on the authors' recommendations. They deserve serious consideration by all those concerned with the problem.^{4/}

Although the problems of apprenticeship are integral to manpower policy, they are outside the scope of the Greenleigh Associates study of the administration of training programs. (Accordingly, recommendations on apprenticeship programs are not offered. The apprentice entry program, for which continued support is recommended, is funded under MDTA. The expansion of Apprenticeship Information Centers is urged in the earlier recommendation here on the Employment Service; in some cities such centers are presently part of ES operations.)

^{4/}Quoted in the Johns Hopkins Press publication announcement for The Negro and Apprenticeship.

A P P E N D I C E S

Appendix I

GOALS AND OBJECTIVES FOR MANPOWER POLICY: OBSERVATIONS FROM MANPOWER SPECIALISTS

Harold C. Taylor, "Perspective for Public Understanding of Federal Manpower Programs," Dimensions of Manpower Policy: Programs & Research, eds. Sar A. Levitan & Irving H. Siegel (Baltimore: The Johns Hopkins Press, 1966), pp. 10-11:

The vagueness of stated objectives in the legislation [Manpower Development and Training Act and the Economic Opportunity Act] is pointed out here as a fact for the intelligent citizen to keep in mind, not necessarily as something that should be changed. Perhaps priority lines should be drawn more explicitly in the laws, or by the Secretary of Labor or others responsible for administration; but there are plausible reasons for not doing so. One reason is that many situations which would be hotly debated in principle cause remarkably little difficulty in practice... Another reason for leaving objectives somewhat open-ended is that a priority proper for one program at one time in one place might not be very sensible for another program at another time in another place.

Seymour L. Wolfbein, Education and Training for Full Employment (New York and London: Columbia University Press, 1967), pp. 1, 3-4:

During the first half of the 1960s three primary changes occurred in the United States which called for such a basic reorientation in attitudes, policies, and programs of action as to warrant the term revolutionary. Involved have been the pursuit of new economic policy aimed at effecting enough employment growth to make a meaningful dent on unemployment in the United States; the emergence of an active and affirmatively conducted manpower policy with the goal of providing a well-educated and trained supply of labor working under fair labor standards; and the challenge to the standing relationships between work and income heralded by advancing technology and looking toward rising levels of living for all members of a generally well-to-do society...

Matching these developments [economic policy] have been a substantial variety of steps which have been brought together in the form of a deliberately conducted, affirmative manpower policy. Here again, the range of new policies and programs has been very large, involving enhancement of public-employment services, new dimensions in such income-maintenance measures as unemployment and old-age

insurance, as well as minimum wages, area economic development, federal aid for migration and mobility, and a host of antidiscrimination legislative enactments aimed at removing the age, sex, and especially color dimensions from consideration in the American job market.

R. A. Gordon, *University of California, Berkeley*, "Introduction," *Toward a Manpower Policy*, ed. Robert Aaron Gordon (New York: John Wiley & Sons, Inc., 1967), pp. 4-5:

...we find ourselves today with a fairly elaborate and not very well-coordinated set of manpower programs, which seek to achieve a set of not too clearly formulated objectives along several different socio-economic dimensions...the approach thus far has been piecemeal, so it can hardly be said that an integrated and comprehensive labor-market policy has yet emerged.

Richard A. Lester, *Manpower Planning in a Free Society* (Princeton: Princeton University Press, 1966), p. 170:

More attention needs to be given to fitting the diverse elements [of American manpower policy] into a rational, over-all framework.

Philip Arnow, U. S. Department of Labor, "What Are Our Manpower Goals?", *Toward a Manpower Policy*, *op. cit.*, pp. 41, 46, 53, 54:

...He [Dr. Garth Mangum] has started, as everyone must, with the three major goals that have become the cornerstones of manpower policy as presented in the annual manpower reports of the President: creating jobs, training people for jobs, and matching people and jobs.

...there are specific and different program implications that flow from...goal-setting. For example, current emphasis on youth and minority-group unemployment rates and on specific programs which could bring these two rates down as a key part of the process of reducing the overall unemployment rate, clearly yield different programs--and different results--than activity directed only at the overall rate without regard to which group of unemployed persons is affected.

...Should we have specific separate goals for each part of the whole, as part of our manpower policy? How official should these goals be? And what should they be?

...The goals we have talked about are invariably expressed in terms of quantities--numbers of workers to be brought into jobs and unemployment to be reduced to an acceptable numerical low level. How

about the quality of work and life? ...We have not yet begun to consider programs that will enable people to apply their abilities better by changing jobs without loss of security or by improving their productive potential by refreshment gained through sabbaticals and adult education.

...our manpower goals are dynamic goals, perhaps fixed in the broadest conception but certainly changing in their application. Perhaps this is partly because the whole matter of setting manpower goals is relatively new.

William G. Bowen, Princeton University, "Discussion," ibid., pp. 58-62:

It is a brave man who writes a paper on manpower goals--or who discusses one. Platitudes are hard to avoid, because so often they seem appropriate--indeed, are appropriate...

At the highest level of conceptualization, all of our various sets of proximate goals, ranging from manpower goals to foreign policy goals, ought to be derived from a single set of notions concerning the nature and characteristics of the good life...

...a second level of goals...are more immediately related to manpower policies and...can be viewed as means to the attainment of our ultimate goals.

Here we might list low unemployment, reasonable price stability, an efficient allocation of resources, a satisfactory rate of economic growth, concern for the economic security of the individual and his family, and the promotion of social welfare--this latter rubric encompassing equality of opportunity, fair treatment of minority groups, and the elimination of concentrations of poverty. ...the task of manpower policy is to contribute to the attainment of this broad set of goals...

The next stage in the goal-setting process should consist of the identification of a still more proximate set of goals particularly susceptible to the blandishments of manpower policies...

1. Improving the effectiveness with which our system of labor markets performs its allocative function...
2. Making it possible for each person to receive the optimal amount and kind of education, training, and health care...
3. Improving the job opportunities of disadvantaged groups...

It must be at least equally plain that the goals stated above are nonoperational, in the sense that no specific set of program implications flows from them. This is as it should be and is no cause for apology. There is at least a rough and ready distinction to be

drawn between goals which describe what we want to see come about and programs meant to accomplish those ends. Our broad goals ought to be clear, shining targets, largely impervious to the shifting circumstances of the day (which is not to say that the relative importance of pursuing various goals ought to be unaffected by changing circumstances). Operational programs, on the other hand, must have a much more pragmatic cast.

...I do not think that manpower policies per se should have as one of their main goals a reduction in the overall level of unemployment by 1 million or any other number. In the short run, at any rate, the primary determinant of the level of unemployment is the level of aggregate demand...

...The really challenging task for manpower policies is to see to it that the job prospects of certain segments of the community are not limited to 'a' job but that those groups of people, who through no fault of their own now find themselves at the end of every job queue, have a fairer crack at securing not just a job now but good jobs throughout their lifetimes.

Arnold R. Weber, University of Chicago, "Discussion," ibid., pp. 65-68:

Philip Arnow enumerates, directly or by implication, at least 12 generic categories of goals available to the apprentice goal-setter. These include intermediate and ultimate goals, specific and general, social and individual, dynamic and static, long-run and short-run, and qualitative and quantitative goals. If, like Arnow, we accept Garth Mangum's threefold classification of substantive objectives in the area of manpower policy, i.e., creating jobs, training people for jobs, and matching people and jobs, we immediately have 36 possible goals from which to choose...

...such an exercise does indicate the range of options and problems that await the policy-maker who is commissioned to formulate manpower goals on an Olympian level. In fact, the goals of manpower policy, like the policy objectives in other areas of social and economic activity, cannot be formulated in vacuo. Instead, these goals must reflect the context and technical constraints that will affect their implementation...

First, national manpower goals and programs must be related to other, private activities concerned with the process of manpower development, allocation, and utilization...there is ample evidence that most manpower issues have been and will continue to be resolved by private individuals and institutions...

...the simple categorization of manpower goals and programs may

overlook important considerations of substitutability and complementarity...

Third, it is probably redundant, but necessary, to state that the formulation of manpower goals cannot be insulated from short-term political pressures and must be flexible enough to accommodate them...

...My preference is to simplify the task by specifying two types of programs: those that are client-oriented and those that are institution-building and improving...That is, there are those manpower programs that will have as their objective the alleviation of the economic plight of identifiable groups that, at any particular time, suffer special disabilities in the labor market...

On the other hand, there are those programs whose goal will be to build or improve those institutions that are directly concerned with the quality and allocation of the nation's manpower.

Lester C. Thurow, Harvard University, "The Role of Manpower Policy in Achieving Aggregative Goals," ibid., p. 72:

...manpower policies are here defined as programs designed to improve the matching of skills demanded and supplied in the labor market...

...The four goals [of manpower policies] are: (1) high growth, (2) low unemployment, (3) income equalization, and (4) stable prices...

Nathaniel Goldfinger, AFL-CIO, "Discussion," ibid., p. 110:

...we need two different levels of policies simultaneously - policies to get at existing problems immediately and as best we can, while we work on the long range solutions that may require twenty, thirty, or more years.

Joseph A. Kershaw, Office of Economic Opportunity, "The Need for Better Planning and Coordination," ibid., pp. 118-119, 121-122:

...In terms of the manpower-planning system, our objective appears to be fairly simple and straightforward. I should suppose it could be specified as the achievement of employment at its full potential for everyone who has the capacity and desire to work. Like most objectives, of course, this will turn out to be less simple upon examination...

...Let me describe briefly the four main categories of need which these unemployed, underemployed, or nonemployed have. First, is the category called job creation...

The second class of needs that manpower programs must meet is skill training...

The third set of needs can be said to fall under the general rubric of literacy and what might be called personal training...

Finally, there is a group of needs which perhaps should be called miscellaneous or 'all other.' [E.g., health care, child-care centers.]

Frederick Harbison, Princeton University, "Discussion," ibid., pp. 136, 138:

...In the broadest terms, manpower policy should be concerned with development, maintenance, and utilization of actual or potential members of the labor force, including those who are fully and productively employed as well as those who experience difficulty in getting work.

Thus, a comprehensive manpower policy would encompass all programs or activities directly related to the development, maintenance, and utilization of the labor force, and a cohesive manpower policy would call for a logical and consistent strategy to guide all activity along these lines. This would be a large order. It would require the combined effort of thousands of policy-makers--private employers, local school boards, community action groups, state education authorities, labor and welfare departments, a wide-ranging group of federal government agencies and institutions, as well as the federal, state, and local governments as direct employers of manpower. In a pluralistic society characterized by decentralized decision-making, manpower policy is almost everyone's business.

John T. Dunlop, Harvard University, "An Overall Evaluation and Suggestions for the Future," ibid., pp. 360, 368:

The discussion of manpower policy, in my view, will be more meaningful and rigorous if a distinction is made between narrow labor-market policies designed to influence the operation of that [labor] market within a given institutional and policy context and a gross concept which seeks to identify the various separate effects on the labor market of changes in general economic policy, educational policy, welfare programs, civil rights, the health system, and the military-personnel system. Manpower policy needs to understand the

interrelations with these other programs and policies, but manpower policies as such cannot fruitfully encompass this larger universe.

...manpower policies should not be oriented solely to the disadvantaged, crucial as these problems are for our time. If the economy is to operate at a high level of employment, say, in the range of 3 to 4 per cent unemployment, then programs for treating shortages have no less an integral role than those oriented toward the unemployed and the disadvantaged. The interrelations between general economic policy and manpower policy cannot be ignored...

Herbert S. Parnes, The Ohio State University, Manpower Development Needs-An Overview (Morgantown: West Virginia University, Appalachian Center, June 1967), pp. 5, 10-13:

More specifically, there are five essential components of an active manpower policy:

- (1) Promoting a high rate of economic growth.
- (2) Assuring fullest development of potential manpower resources.
- (3) Promoting effective utilization of resources.
- (4) Providing for the efficient operation of labor markets.
- (5) Guaranteeing the maintenance of incomes during periods in which individuals, for one reason or another, are not able to earn them.

...What does all this add up to so far as manpower policy is concerned? In addition to maintaining a high level of demand in the economy, what additional measures are necessary?

...For this group of workers [i.e., those who have skills and know-how but are unemployed or in undesirable jobs] the only need is for efficient organization of the labor market. There must be a means whereby they can know about other jobs...

...For this group [i.e., those who do not have marketable skills that promise a reasonably secure future, but are capable of acquiring them through training], the remedy is also rather clear. Training opportunities consistent with their aptitudes and interests that will prepare them for existing employment opportunities are the solution.

...[The group of individuals who have barriers to employment that are greater than the lack of a saleable skill] poses the greatest difficulties and requires the most imaginative and boldest programs...For this group, there is no single prescription...

Turning to the longer-run aspects of manpower policy, it is cer-

tainly as important to foresee and to attempt to prevent future problems as it is to deal with those that currently exist...

...It means, first of all, that we ought to try to have as good an idea as possible of what the job opportunities of tomorrow will be.

Second, it means that our educational system should be geared to the requirements of tomorrow's job opportunities.

Third, it means that youngsters ought to be made aware at the earliest possible age of the range of job opportunities in the world of work and of the educational requirements that are related to each...

Fourth, it means that formal education at all levels ought to be designed to build as much flexibility as possible into the individual so that he can readily adjust to changes in job structure.

Fifth, and perhaps most important of all, it means that we must be much more successful than we have been in insuring equality of educational opportunity.

Richard A. Lester, Princeton University, "National Manpower Administration and Policies," International Labor, eds. Solomon Barkin et al. (New York and London: Harper & Row, 1967), pp. 205, 207-208:

In Western Europe in the postwar period, full employment has stimulated new policies and programs in the manpower field... Necessity, not ideology, has been the moving force toward an active manpower policy.

...Any attempt to improve a country's use of its manpower resources should rest on short- and long-range projections of manpower requirements and supplies by occupation, industry, and area...The economic and manpower forecasts should mesh and, thus, serve as a basis for coordinating general economic policy and manpower policy...

In Western Europe since World War II, the role of central governments in manpower activities has tended to expand. Two improvements in economic understanding have encouraged such expansion. One has been increased recognition that advancement in the quality of the labor force through education and training is an important factor in a nation's economic growth. The other has been growing appreciation of the need, in a modern industrialized economy, to integrate a government's economic and manpower policies. These two conceptual advances should be borne in mind in considering the extent to which centralization of policy determination and program

operations has actually occurred in various Western European countries.

Solomon Barkin, University of Massachusetts, "Issues and Research Needs Relative to Manpower," ibid., pp. 250-251:

Manpower programs and social policies have in the past generally developed in an isolated fashion, as specific groups in the population have gained public support and interest, or as one or another deficiency in the operation of the labor market has become apparent. Little or no effort was made at the beginning of such action at attaining administrative integration or consistency. The principal emphasis was upon getting public obligations defined and confirmed. The measures were designed to extend economic protection, provide employment, grant aids and benefits, or collect facts. As the number of such programs multiplied, however, and the objectives increased, it was asked whether a unified system might not be necessary, thus allowing the respective parts of the labor market to complement and reinforce each other and, if this were the case, how such a system should be administered.

A further stimulus to such integration was the growing consensus in countries on realizing certain economic and social goals. The trend was to find methods of harmonizing individual economic, political and social targets and translating these into concrete financial terms in national budgets. Moreover, as their costs mounted, priorities had to be established in relation to the nation's economic capacity and purposes...Even countries which limit the degree of direct intervention and consider that their primary responsibility is to create an appropriate environment within which the private groups may act have increasingly to appraise the effect of their decisions upon trends in the economy and society. National policy-makers have therefore to view economic and social operations as a whole.

In consequence, manpower authorities have had to move in similar directions...Manpower authorities have, therefore, had to consider themselves part of a total system of national decision-making and their own organization as an integrated program of instruments and measures to help achieve overall objectives.

Appendix II

EXCERPTS FROM
THE REPORT OF THE EMPLOYMENT SERVICE TASK FORCE^{1/}

Our recommendations fall into seven areas:

1. A statement about the appropriate role and mission of the Employment Service.
2. Further separation of the administration of the Employment Service from the administration of Unemployment Compensation.
3. Improving relations with other groups in the labor market.
4. New provisions for improving the quality and compensation of Employment Service personnel, principally at the state and local levels.
5. Emphasis on the role of the Employment Service in collecting and disseminating information about the job market.
6. Improving the interarea recruitment procedures with the aid of modern information technology.
7. Suggestions for administrative matters designed to improve the quality of management in the Service and strengthening its finances.

...In recent years, Congress has recognized the importance of human resources and of their full development and has made significant legislative break-throughs, establishing ambitious objectives and new programs in the manpower area. A renewed and modernized Employment Service is essential to the effective administration of these programs. Our recommendations are designed to build such a Service and many of them require legislative action.

...The public Employment Service can no longer be considered a simple labor exchange bringing together job seekers and employers. Rather, it must be established as a comprehensive manpower services agency whose activities provide vital support for a variety of government programs.

^{1/} The Task Force was chaired by Dean George P. Shultz of the University of Chicago, with Professors Arnold Weber and Daniel Kruger as Vice Chairman and Executive Secretary, respectively. Its twelve other members included management, labor, and public representatives. On December 23, 1965 the Task Force submitted its unanimous report to the Secretary of Labor. Excerpts are taken from the Report as reprinted in full in Toward a Manpower Policy, op. cit., pp. 144-173.

...First, the Employment Service should assume responsibility for the analysis, and dissemination of labor market information in the broadest sense, and the collection and use of such information at the local level...The attainment of this objective is a pre-condition for intelligent planning and decision-making by all organizations or individuals with a stake in an efficient labor market.

...Second, the public Employment Service is in a strategic position to function as a manpower center at the community and labor market levels...The 2,000 offices of the Employment Service constitute an established network connecting all the important labor market areas of the nation. Through these offices, job seekers who need help should be able to obtain the testing, in-depth counseling and current information that are essential parts of the job placement process. Moreover, the Employment Service should be the main governmental link between the diagnosis of deficiencies that impair an individual's employability and referral to the various government or private programs for training and rehabilitation...The development of a comprehensive manpower services center can provide a powerful antidote to the casual, "one-shot" placement psychology that has frequently characterized the Employment Service in the past.

...specification of the functions and needs of the Employment Service does not mean that it is, or should be the dominant manpower agency in the economy. To the contrary, the importance of the Employment Service stems from the fact that in carrying out its responsibilities and functions it interlocks with a diversity of public and private institutions...

...Employment Service personnel at every level must make a positive effort to understand and cope with the special problems that confront members of racial minorities in the labor market. In addition, particular diligence should be exercised in helping these individuals to benefit from the various public and private programs that will enhance their employability...

...Different personnel skills are required to operate a manpower services center as contrasted to the administration of the unemployment compensation laws...In addition, the emphasis on Unemployment Compensation has created a public image of the Employment Service that obscures other more positive elements of its overall program...Considerations such as these have already led the Employment Service to separate its activities from Unemployment Compensation in cities of 250,000 and over. Furthermore several states, notably Arizona and Wisconsin, have completely separated the administration of the Employment Service from the operations of Unemployment Compensation. We believe that this process should be extended to all states and to the national office...

The problem of salaries, of course, is reflected in the inability of many state agencies to attract and retain competent personnel. Of the close to 3,000 new appointees as employment interviewers in the 50 State agencies during fiscal year 1956, only three-fifths were college graduates and close to one-fifth had no college training at all (Table 2). In the 25 states with the highest salaries for employment interviewers, these proportions were 68 per cent and 14 per cent respectively, while in the bottom half of the distribution only 44 per cent had college degrees and over a fourth had no college. Nationally, one-eighth of the new appointees left their jobs before completing a full year of service. Moreover, the persons who left tended to be better qualified in terms of educational attainment and civil service examination scores than those who remained.

While there is no question of the need for substantial upgrading of personnel, it is doubtful that the Task Force proposals would produce the desired result. The Secretary of Labor already has the authority to require States to adopt minimum qualifications for professional personnel and has presumably not been unmindful of the problem under consideration; yet it has persisted. It is not clear how explicit reference to this authority in the statute would significantly alter the situation. The basic problem, of course, lies in reconciling the need for higher salaries for Employment Service personnel with the preservation of a rational salary structure within State government. But sound principles of personnel administration and statutory provisions in many States make it questionable that salaries of particular categories of employees can be raised substantially relative to those of other State employees-some of whom would be in the same agency.

The recommendations of the Task Force that have generated the most controversy are those designed to give the Employment Service a separate identity. In part, these proposals stem from a desire to improve the "image" of the Service that results from its identification as the "unemployment office." In part, they are intended to improve the efficiency of the Service by assuring the functional specialization and professional integrity of employment interviewers and counselors, who are frequently called upon to double as claim-takers in offices where unemployment insurance and employment service operations are combined under a single manager.

While there is considerable *prima facie* validity to the logic of the Task Force, it is difficult to avoid the conclusion that their specific recommendations on these matters went somewhat too far. There is not complete agreement that the separation already achieved in the largest metropolitan areas has produced any perceptible improvement in operations, and there are clearly significant disadvantages in the form of increased costs and increased inconvenience to unemployment insurance claimants. But even if separation is

desirable in the larger offices, it does not follow that it is feasible or wise in all offices, which the Task Force set as an ultimate goal. There are over 500 local employment offices in the United States with 5 or fewer employees, and as many as 1,000 with a staff no greater than 10. Many of the witnesses before the Senate and House subcommittees pointed, with varying degrees of restraint, to the folly of attempting to separate offices of this size.

The Task Force recommendation that the Employment Service be financed primarily from general revenues also seems to be questionable. Giving up the assured source of funds from the unemployment insurance tax for the vagaries of Congressional appropriations seems too great a price to pay for whatever nebulous advantages may lie in that course of action. Moreover, employers may be more inclined to use the Service when they feel that they are paying for it via the Federal payroll tax than they would if it were financed from general revenues. This is not to deny the desirability of supplementing unemployment insurance tax funds from the general revenues; but there is already limited precedent for that practice.

On the issue of separation of employment service and unemployment compensation activities, as well as on many of the other elements of the Task Force recommendations, it is possible for informed men of good will to disagree. There is a remarkable lack of hard evidence on the relation between alternative organizational forms and functional efficiency...In the absence of such evidence, it seemed appropriate to examine systematically the judgments of persons experienced in the operation of the State Employment Security agencies. Accordingly, brief questionnaires were sent to the 50 State administrators, asking them to register their agreement or disagreement with the major recommendations that had been made for improving the Employment Service...The State administrators are evenly divided as to whether separate employment service offices have improved operations in cities where they have already been established. But a substantial majority (three-fourths) oppose the Task Force goal of separating all offices. The proportions hostile to separate financing, separate administration, and separate advisory councils are somewhat smaller, ranging between about 50 and 60 per cent.

While virtually unanimous in recognizing the evil of inadequate salaries, three-fourths of the administrators nevertheless take a jaundiced view of the imposition of minimum qualification *and salary* standards by the Federal government. The other Task Force proposals designed to improve the quality of personnel are more congenial to the respondents...

The responses of the administrators reflect a fairly widespread recognition of the need for improving the interarea clearance sys-

tem. The almost two-to-one majority favoring the Task Force proposal for nationally coordinated "multi-market clearance centers" is especially noteworthy because the proposal clearly involves strengthening the Federal role vis-a-vis the States...

The most interesting aspect of the results of the survey is the diversity of opinion among the administrators. On literally every one of the issues there is some sentiment on each side, and unanimity is approached only on the assertions that a new legislative mandate for the Employment Service is needed and that unduly low State salaries limit the effectiveness of the Service...

With the exceptions that have been noted, there is not much question that implementation of the Task Force recommendations would operate to improve the general effectiveness of the Employment Service. It would be naive, however, to suppose that they constitute the ultimate in the development of an "active manpower policy." In the first place, for reasons that have been explained, there are limits to which some of the basic problems of the Service--particularly the low salaries of operating personnel--can be ameliorated within the confines of a Federal-State system. But more fundamentally, good organizational structure can at best be permissive; it does not itself produce results in the absence of an adequate program. If the Employment Service is indeed to become the chief agent for implementing a "positive" or "active" manpower policy, there needs to be a real national commitment to such a policy...Despite the strides in this direction represented by the legislation of the past several years, there is a long way yet to go...

Appendix IV

EXCERPTS FROM THE REPORT BY THE PRESIDENT'S NATIONAL ADVISORY COMMISSION ON RURAL POVERTY^{1/}

The Commission recommends-

1. That a comprehensive Manpower Act be enacted by Congress to establish a national policy of providing necessary manpower services to all workers.

...The Federal-State Employment Service system should be restructured and upgraded to occupy a key role in the implementation of the national comprehensive manpower program.

The local offices of the employment service should continue to certify workers' eligibility for unemployment benefits based on the availability of suitable work. However, the employment service and its local offices should be relieved of all other responsibilities pertaining to the processing of unemployment compensation claims and the administration of the unemployment compensation system. This would enable the employment service to concentrate on its main concern--matching workers with jobs, and related functions. Then, an image of the employment service could be projected that would attract workers and employers who need these services.

^{1/} The People Left Behind: A Report by the President's National Advisory Commission on Rural Poverty (Washington, D. C.: U. S. Government Printing Office, September 1967), "Chapter 4, Manpower Policies and Programs."

(It should be noted that one Commission member--David W. Brooks, Executive Vice President and General Manager, Cotton Producers Association--filed a Memorandum of Reservation on several chapters of the Commission Report, including Chapter 4: "Although I have refrained from making a minority report, in my opinion some parts of the report cover matters which have little, if any connection with the problems of rural poverty and, therefore, should have been eliminated.")

The Commission recommends-

2. *That the Employment Service System and the Unemployment Compensation System be separated, legally and administratively.*

To some extent, the poor quality of manpower services available to rural workers generally, and the wide disparity of manpower services among regions, States, and areas, can be attributed to the current organization of the Federal-State Employment Service System. Actually, there are 50 State systems and a Federal system, all financed totally by the Federal Government. The Federal system consists of a national office and 11 regional offices. The national office has jurisdiction over the regional offices. However, neither the national office nor the regional offices have real jurisdiction or authority over the State systems. The regional offices serve more or less as liaison and mail drops between the national office and the States. The national office can suggest guidelines and standards through the regional offices for the States. However, such guidelines and standards can be ignored by the State employment service administrations since they are subject to the authority and jurisdiction of State governments. Indeed, most of the top administrative offices in the State systems are political appointments. Reportedly, in some States almost all of the personnel in the State offices are political appointees. The Commission does not wish to condemn political appointment in the employment service per se. However, such appointments should not be allowed if they are not in the best interest of the employment service program.

In short, the State employment service systems operate mostly as independent entities and there is no supervisory or regulatory body exercising real authority and leadership in coordinating them to the end of providing high quality, dependable manpower services in all parts of this country.

The Commission recommends-

3. *That the Federal-State Employment Service be reorganized to form a national unified system with appropriate assignment of responsibility and authority at the Federal, regional, State, and local levels. If it is necessary to federalize the employment service to implement fully a comprehensive manpower program in all areas, the Commission would endorse such a measure.*

A comprehensive Employment Service Act should be enacted by Congress, and the Office of Farm Labor Service and other agencies primarily concerned with such functions should be combined into one national employment service system. A beefed-up program should be structured for the regional offices. New guidelines and regulations with teeth

in them should be formulated and issued to the States. The national office, acting through the programs of the regional offices, should cooperate actively and creatively with the States in extending standard manpower services to all workers through the local offices.

The Commission recommends-

4. That the Federal Government participate in the employment service programs at State and local levels, to whatever extent is necessary to guarantee equitable and complete service to all rural people.

In part, the inadequacy of the current employment service system in meeting the manpower needs of rural workers can be attributed to insufficient allocations of financial resources to this important end. Currently, there are about 2,000 local employment security offices in the entire United States. Many of these offices operate part-time. Many only accept unemployment compensation claims and do not engage in any employment service activities. The range of services and the qualifications of staff personnel vary widely. The present number of offices engaged in employment service activities is hardly enough to serve workers in more than 3,000 counties and a host of cities, towns, and districts.

The Commission recommends-

5. Increased appropriation of money for the purpose of enlarging and upgrading the employment service staff, especially at the local level, and for increasing the number of employment service offices to the level required to provide standard manpower services to workers throughout this country.

A modernized employment service system will do little for rural workers without substantive manpower programs tailored to finding jobs for these workers and for helping them to qualify for the kind of work for which they are best suited. The local offices of the employment service are convenient points of contact with workers and employers who need or could benefit from certain services...

Manpower services extended to workers through the employment service system must be organized as manpower programs. From the standpoint of workers and employers in local labor market areas

throughout this nation, several related programs can be discerned from sorely needed services. They include:

1. A labor market information and placement program.
2. An individualized manpower assessment program.
3. A job-oriented training and retraining program.
4. A manpower adjustment program.
5. A comprehensive and active approach to manpower problems.

Appendix V

EXCERPTS FROM ECONOMIC OPPORTUNITY ACT AMENDMENTS OF 1967

TITLE I—WORK TRAINING AND WORK-STUDY PROGRAMS¹

...

"PART B --WORK AND TRAINING FOR YOUTH AND ADULTS

"STATEMENT OF PURPOSE

"SEC. 120. The purpose of this part is to provide useful work and training opportunities, together with related services and assistance, that will assist low-income youths to continue or resume their education, and to help unemployed or low-income persons, both young and adult, to obtain and hold regular competitive employment, with maximum opportunities for local initiative in developing programs which respond to local needs and problems, and with emphasis upon a comprehensive approach which includes programs using both public and private resources to overcome the complex problems of the most severely disadvantaged in urban and rural areas having high concentrations or proportions of unemployment, underemployment, and low income.

"COMMUNITY PROGRAM AREAS AND COMPREHENSIVE WORK AND TRAINING PROGRAMS

"SEC. 121. (a) The Director shall designate or recognize community program areas for the purpose of planning and conducting comprehensive community work and training programs.

"(b) For the purpose of this part, a community may be a city, county, multicity, or multicounty unit, an Indian reservation, or a neighborhood or other area (irrespective of boundaries or political subdivisions) which provides a suitable organizational base and possesses the commonality of interest needed for a comprehensive work and training program. The Director shall consult with the heads of other Federal agencies responsible for programs relating to community action, manpower services, physical and economic development, housing, education, health, and other community services to encourage the establishment of coterminous or complementary boundaries for planning purposes among those programs and comprehensive work and training programs assisted under this part.

"(c) A comprehensive work and training program must seek to provide participants an unbroken sequence of services which will enable them to obtain and hold employment. It shall provide a systematic approach to planning and implementation including the linkage of relevant component programs authorized by this Act with one another and with other appropriate public and private programs and activities. It shall also provide for evaluation.

"PRIME SPONSORS AND DELEGATE AGENCIES

"Sec. 122. (a) For each community program area, the Director shall recognize a public or private nonprofit agency which shall serve as the prime sponsor to receive funds under section 123 (except as otherwise provided in section 123(c)). This agency must be capable of planning, administering, coordinating, and evaluating a comprehensive work and training program.

"(b) The prime sponsor shall provide for participation of employers and labor organizations in the planning and conduct of the comprehensive work and training programs.

"(c) The prime sponsor shall be encouraged to make use of public and private organizations as delegate agencies to carry out components of the comprehensive work and training program, including without limitation agencies governed with the participation of the poor and other residents of the neighborhoods or rural areas served, educational institutions, the public employment service, the public welfare agency, other health and welfare agencies, private training institutions, and other capable public and private organizations.

"(d) The prime sponsor and delegate agencies shall provide for participation of residents of the area and members of the groups served in the planning, conduct, and evaluation of the comprehensive work and training program and its components. Such persons shall be provided maximum employment opportunity in the conduct of component programs, including opportunity for further occupational training and career advancement.

"(e) The Director shall prescribe regulations to assure that programs under this part have adequate internal administrative controls, accounting requirements, personnel standards, evaluation procedures, and other policies as may be necessary to promote the effective use of funds.

"ELIGIBLE ACTIVITIES

"Sec. 123. (a) The Director may provide financial assistance in ~~work and training~~ programs in urban and rural areas for comprehensive work and training programs ~~ing programs~~ or components of such programs, including the following:

"(1) programs to provide part-time employment, on-the-job training, and useful work experience for students from low-income families who are in the ninth through twelfth grades of school (or are of an age equivalent to that of students in such grades) and who are in need of the earnings to permit them to resume or maintain attendance in school;

"(2) programs to provide unemployed, underemployed, or low-income persons (aged sixteen and over) with useful work and training (which must include sufficient basic education and institutional or on-the-job training) designed to assist those persons to develop their maximum occupational potential and to obtain regular competitive employment;

"(3) special programs which involve work activities directed to the needs of those chronically unemployed poor who have poor employment prospects and are unable, because of age, lack of employment opportunity, or otherwise, to secure appropriate employment or training assistance under other programs, and which, in addition to other services provided, will enable such persons to participate in projects for the betterment or beautification of the community or area served by the program, including without limitation activities which will contribute to the management, conservation, or development of natural resources, recreational areas, Federal, State, and local government parks, highways, and other lands;

"(4) special programs which provide unemployed or low-income persons with jobs leading to career opportunities, including new types of careers, in programs designed to improve the physical, social, economic, or cultural condition of the community or area served in fields including without limitation health, education, welfare, neighborhood redevelopment, and public safety, which provide maximum prospects for advancement and continued employment without Federal assistance, which give promise of contributing to the broader adoption of new methods of structuring jobs and new methods of providing job ladder opportunities, and which provide opportunities for further occupational training to facilitate career advancement;

"(5) special programs which concentrate work and training resources in urban and rural areas having large concentrations of proportions of low-income, unemployed persons, and within those rural areas having substantial immigration to urban areas, which are appropriately focused to assure that work and training opportunities are extended to the most severely disadvantaged persons who can reasonably be expected to benefit from such opportunities, and which are supported by specific commitments of cooperation from private and public employers; **Concentrated employment program.**

"(6) supportive and follow-up services to supplement work and training programs under this or other Acts including health services, counseling, day care for children, transportation assistance, and other special services necessary to assist individuals to achieve success in work and training programs and in employment;

"(7) employment centers and mobile employment service units to provide recruitment, counseling, and placement services, conveniently located in urban neighborhoods and rural areas and easily accessible to the most disadvantaged;

"(8) programs to provide incentives to private employers, other than nonprofit organizations, to train or employ unemployed or low-income persons, including arrangements by direct contract, reimbursements to employers for a limited period when an employee might not be fully productive; payment for on-the-job counseling and other supportive services; payment of all or part of employer costs of sending recruiters into urban and rural areas of high concentrations or proportions of unemployed or low-income persons, and payments to permit employers to provide employees resident in such areas with transportation to and from work or to reimburse such employees for such transportation; *Provided*, That in making such reimbursements to employers the Director shall assure that the wages paid any employee shall not be less than the minimum wage which would be applicable to employment under the Fair Labor Standards Act of 1938 if section 6 of such Act applied to the employee and he was not exempt under section 13 thereof; and

"(9) means of planning, administering, coordinating, and evaluating a comprehensive work and training program.

"(b) Commencing July 1, 1968, all work and training component programs conducted in a community under this section shall be consolidated into the comprehensive work and training program and financial assistance for such components shall be provided to the prime sponsor unless the Director determines there is a good cause for providing an extension of time, except as otherwise provided by subsection (c). After that date, the work and training components of programs authorized by section 502 of this Act and by section 261 of part E of title II of the Manpower Development and Training Act of 1962 shall to the maximum extent feasible be linked to the comprehensive work and training program, including funding through the prime sponsor where appropriate.

"(c) The Director may provide financial assistance to a public agency or private organization other than a prime sponsor to carry out one or more component programs described in subsection (a) when he determines, after soliciting and considering comments of the prime sponsor, if any, that such assistance would enhance program effectiveness or acceptance on the part of persons served and would serve the purposes of this part. In the case of programs under subsection (a) (1) of this section, financial assistance may be provided directly to local or State educational agencies pursuant to agreements between the Director and the Secretary of Labor providing for the operation of such programs under direct grants or contracts.

...

"ELDERLY

"SEC. 126. The Director shall provide that programs under this part shall be designed to deal with the incidence of long-term unemployment among persons fifty-five years and older. In the conduct of such programs, the Director shall encourage the employment of such persons as regular, part-time, and short-term staff in component programs.

...

"PROGRAM DATA AND EVALUATION

"SEC. 132. (a) The Director shall provide for the development and implementation of a program data system consistent with similar data systems for other relevant Federal programs. Such data shall be published periodically.

"(b) The Director shall provide for the continuing evaluation of the programs under this part, including their effectiveness in achieving stated goals, their impact on related programs, and their structure and mechanisms for the delivery of services, and he shall arrange for obtaining the opinions of participants about the strengths and weaknesses of the programs. This evaluation shall include comparisons with proper control groups composed of persons who have not participated in such programs, and shall seek to develop comparative data on the costs and benefits of work and training programs authorized by this Act and by other Acts, including the Manpower Development and Training Act of 1962. He may, for this purpose, contract for independent evaluations of such programs or individual projects. The results of such evaluations shall be included in the report required by section 608.

"(c) The Director shall develop and publish standards for evaluation of program effectiveness in achieving the objectives of this part. Such standards shall be considered in deciding whether to renew or supplement financial assistance provided by sections 123, 128, and 129."

...

"TITLE II—URBAN AND RURAL COMMUNITY ACTION PROGRAMS

...

"PART B—FINANCIAL ASSISTANCE TO COMMUNITY ACTION PROGRAMS AND RELATED ACTIVITIES

"GENERAL PROVISIONS FOR FINANCIAL ASSISTANCE

"Sec. 221. (a) The Director may provide financial assistance to community action agencies for the planning, conduct, administration and evaluation of community action programs and components. Those components may involve, without limitation, other activities and supporting facilities designed to assist participants including the elderly poor—

- "(1) to secure and retain meaningful employment;**
- "(2) to attain an adequate education;**
- "(3) to make better use of available income;**
- "(4) to provide and maintain adequate housing and a suitable living environment;**
- "(5) to undertake family planning, consistent with personal and family goals, religious and moral convictions;**
- "(6) to obtain services for the prevention of narcotics addiction, alcoholism, and the rehabilitation of narcotic addicts and alcoholics;**
- "(7) to obtain emergency assistance through loans or grants to meet immediate and urgent individual and family needs, including the need for health services, nutritious food, housing, and employment-related assistance;**
- "(8) to remove obstacles and solve personal and family problems which block the achievement of self-sufficiency;**
- "(9) to achieve greater participation in the affairs of the community; and**
- "(10) to make more frequent and effective use of other programs related to the purposes of this title.**

...

"SPECIAL PROGRAMS AND ASSISTANCE

"Sec. 222. (a) In order to stimulate actions to meet or deal with particularly critical needs or problems of the poor which are common to a number of communities, the Director may develop and carry on special programs under this section. This authority shall be used only where the Director determines that the objectives sought could not be effectively achieved through the use of authorities under section 221, including assistance to components or projects based on models developed and promulgated by him. It shall also be used only with respect to programs which (A) involve activities which can be incorporated into or be closely coordinated with community action programs, (B) involve significant new combinations of resources or new and innovative approaches, or (C) are structured in a way that will, within the limits of the type of assistance or activities contemplated, most fully and effectively promote the purposes of this title. Subject to such conditions as may be appropriate to assure effective and efficient administration, the Director may provide financial assistance to public or private non-profit agencies to carry on local projects initiated under such special programs; but he shall do so in a manner that will encourage, wherever feasible, the inclusion of the assisted projects in community action programs, with a view to minimizing possible duplication and promoting efficiencies in the use of common facilities and services, better assisting persons or families having a variety of needs, and otherwise securing from the funds committed the greatest possible impact in promoting family and individual self-sufficiency. Programs under this section shall include those described in the following paragraphs:

...

"(8) A program to be known as 'Senior Opportunities and Services' designed to identify and meet the needs of older, poor persons above the age of 60 in one or more of the following areas: development and provision of new employment and volunteer services; effective referral to existing health, welfare, employment, housing, legal, consumer, transportation, education, and recreational and other services; stimulation and creation of additional services and programs to remedy gaps and deficiencies in presently existing services and programs; modification of existing procedures, eligibility requirements and program structures to facilitate the greater use of, and participation in, public services by the older poor; development of all-season recreation and service centers controlled by older persons themselves; and such other activities and services as the Director may determine are necessary or specially appropriate to meet the needs of the older poor and to assure them greater self-sufficiency. In administering this program the Director shall utilize to the maximum extent feasible the services of the Administration of Aging in accordance with agreements with the Secretary of Health, Education, and Welfare.

"Senior Opportunities and Services."

...

TITLE III—SPECIAL PROGRAMS TO COMBAT POVERTY IN RURAL AREAS

...

"PART B—ASSISTANCE FOR MIGRANT, AND OTHER SEASONALLY EMPLOYED, FARMWORKERS AND THEIR FAMILIES

"STATEMENT OF PURPOSE

"SEC. 311. The purpose of this part is to assist migrant and seasonal farmworkers and their families to improve their living conditions and develop skills necessary for a productive and self-sufficient life in an increasingly complex and technological society.

"FINANCIAL ASSISTANCE

"SEC. 312. (a) The Director may provide financial assistance to assist State and local agencies, private nonprofit institutions and cooperatives in developing and carrying out programs to fulfill the purpose of this part.

"(b) Programs assisted under this part may include projects or activities—

"(1) to meet the immediate needs of migrant and seasonal farmworkers and their families, such as day care for children, education, health services, improved housing and sanitation (including the provision and maintenance of emergency and temporary housing and sanitation facilities), legal advice and representation, and consumer training and counseling;

"(2) to promote increased community acceptance of migrant and seasonal farmworkers and their families; and

"(3) to equip unskilled migrant and seasonal farmworkers and members of their families as appropriate through education and training to meet the changing demands in agricultural employment brought about by technological advancement and to take advantage of opportunities available to improve their well-being and self-sufficiency by gaining regular or permanent employment or by participating in available Government training programs.

GLOSSARY OF ACRONYMS

ABE	Division of Adult Basic Education, OE, HEW <i>or</i> Adult basic education programs
ACEOA	Advisory Committee on Equal Opportunity in Apprenticeship and Training
AFDC	Aid to Families with Dependent Children (SSA)
AIC	Apprenticeship Information Center (ES)
AOC	Adult Opportunity Center (ES)
APA	Assistance Payments Administration, SRS, HEW (formerly Bureau of Family Services)
BAT	Bureau of Apprenticeship and Training, Manpower Administration, Department of Labor
BAVE	Bureau of Adult and Vocational Education, OE, HEW (now Bureau of Adult, Vocational and Library Programs)
BAVLP	Bureau of Adult, Vocational and Library Programs, OE, HEW
BES	Bureau of Employment Security, MA, DOL
BFS	Bureau of Family Services, HEW (now Assist- ance Payments Administration)
BIA	Bureau of Indian Affairs, Department of the Interior
BOP	Bureau of Prisons, Department of Justice
BWP	Bureau of Work Programs, MA, DOL (now Bureau of Work-Training Programs)
BWTP	Bureau of Work-Training Programs, MA, DOL
CAA	Community Action Agency (in local communities)
CAMPS	Cooperative Area Manpower Planning System
CAP	Division of Community Action Programs, OEO

CATP	Committee on Administration of Training Programs
CEB	Community Employment and Betterment (<i>also called Operation Mainstream, or Nelson programs</i>)
CEP	Concentrated Employment Program
CSES	California State Employment Service
CWT	Community Work and Training programs, SSA-Title IV (<i>now Work Incentive Program</i>)
DAS	Division of Apprenticeship Standards (in State governments)
DMDT	Division of Manpower Development and Training, OE, HEW
DOL	U. S. Department of Labor
DPW	Department of Public Welfare (in State or local governments)
E&D	Experimental and Demonstration Programs
E&SEA	Elementary and Secondary Education Act
EDA	Economic Development Administration, Department of Commerce <i>or</i> Economic Development Act
EEOC	Equal Employment Opportunity Commission
EOA	Economic Opportunity Act
EOC	Economic Opportunity Council
ES	Employment Service
FY	Fiscal Year
GED	General Equivalency Diploma
HEW	U. S. Department of Health, Education and Welfare
HRD	Human Resources Development (USES)

HUD	U. S. Department of Housing and Urban Development
MA	Manpower Administration, Department of Labor
MAREC	Manpower Administration Regional Executive Committee
MDTA	Manpower Development and Training Act or Programs authorized by above Act
MDTA-PT and O-T-S	MDTA - Part-time and Other-Than-Skill Programs
MSES	Missouri State Employment Service
NC	New Careers (<i>also called Scheuer programs</i>)
NMAC	National Manpower Advisory Committee
NYC	Neighborhood Youth Corps
OE	Office of Education, HEW
OEO	Office of Economic Opportunity
OIC	Opportunity Industrialization Centers
OJT	On-The-Job Training
OMPER	Office of Manpower Policy, Evaluation, and Research, MA, DOL (<i>as of Oct. 23, 1967, OMPER was abolished and its functions absorbed directly into the Manpower Administration</i>)
PCOM	President's Committee on Manpower
PHS	Public Health Service, HEW
PWEDA	Public Works and Economic Development Act (<i>succeeded Economic Development Act</i>)
R&D	Research and Demonstration Division, CAP, OEO or Research and Demonstration Programs
RAR	MDTA - Section 241 programs for Redevelopment Area Residents

RPP&E	Office of Research, Plans, Programs, and Evaluation, OEO
RSA	Rehabilitation Services Administration, SRS, HEW (<i>formerly the Vocational Rehabilitation Administration</i>)
SBA	Small Business Administration, Department of Commerce
SER	Service-Employment-Redevelopment (Spanish- American Programs in the Southwest)
SI	Special Impact (<i>also called Kennedy-Javits programs</i>)
SP	Division of Special Field Projects, CAP, OEO
SRS	Social and Rehabilitation Service, HEW
SSA	Social Security Act <i>or</i> Social Security Administration
USES	United States Employment Service
VA	Veterans Administration
VEA	Vocational Education Act
VRA	Vocational Rehabilitation Act <i>or</i> Vocational Rehabilitation Administration (<i>now Rehabilitation Services Administration</i>)
WEP <i>or</i> WET	Work Experience and Training Program, EOA- Title V
WICS	Women in Community Service
WIP	Work Incentive Program, SSA-Title IV (<i>formerly Community Work and Training</i>)
YOC	Youth Opportunity Center (ES)

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